

EXHIBIT C

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

THE WIMBLEDON FUND, SPC (CLASS)	
TT),)	
)	
PLAINTIFFS,)	
)	
VS.)	CASE NO.
)	2:15-CV-6633-CAS-ASJWx
)	
GRAYBOX LLC; INTEGRATED)	
ADMINISTRATION; EUGENE SCHER, AS)	
TRUSTEE OF BERGSTEIN TRUST; AND)	
CASCADE TECHNOLOGIES CORP,)	
)	
DEFENDANTS.)	
_____)	

VIDEOTAPED DEPOSITION OF MAJID ZARRINKELK

TAKEN ON

TUESDAY, MARCH 26, 2019

Sandra Mitchell
C.S.R. 12553

Page 2

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3
4 THE WIMBLEDON FUND, SPC (CLASS)
5 TT),)
6)
7 PLAINTIFFS,)
8)
9 VS.) CASE NO.
10) 2:15-CV-6633-CAS-ASJWx
11)
12 GRAYBOX LLC; INTEGRATED)
13 ADMINISTRATION; EUGENE SCHER, AS)
14 TRUSTEE OF BERGSTEIN TRUST; AND)
15 CASCADE TECHNOLOGIES CORP,)
16)
17 DEFENDANTS.)
18 _____)
19
20 VIDEOTAPED DEPOSITION OF MAJID ZARRINKELK, taken
21 on behalf of the Plaintiff, at 10100 Santa Monica Boulevard,
22 13th Floor, Los Angeles, California, commencing at
23 10:29 a.m., Tuesday, March 26, 2019, before Sandra Mitchell,
24 C.S.R. 12553, pursuant to Notice.
25

Page 4

1 I-N-D-E-X
2 WITNESS
3 MAJID ZARRINKELK
4 PAGE
5 EXAMINATION BY MR. LATZER 7
6
7 E X H I B I T S
8 NUMBER DESCRIPTION PAGE
9 EXHIBIT 33 - NOTICE OF TAKING DEPOSITION OF MAJID 7
10 ZARRINKELK
11
12 EXHIBIT 34 - BOARD OF ACCOUNTANCY APPLICATION 13
13 1/30/1987
14 EXHIBIT 35 - BUSINESS ACCOUNT APPLICATION - WELLS 62
15 FARGO
16
17 EXHIBIT 36 - BUSINESS ACCOUNT APPLICATION - WELLS 69
18 FARGO
19 EXHIBIT 37 - BUSINESS ACCOUNT APPLICATION - WELLS 75
20 FARGO BANK - PINEBOARD HOLDINGS,
21 INC.
22 EXHIBIT 38 - BANK STATEMENT FOR SWARTZ IP 85
23 SERVICES GROUP, INC.
24
25 EXHIBIT 39 - BANK STATEMENT FOR SWARTZ IP 88
SERVICES GROUP
EXHIBIT 40 - BANK STATEMENTS FOR INTEGRATED 93
ADMINISTRATION
EXHIBIT 41 - E-MAIL - RAY SHAHAB - NOVEMBER 23RD, 123
2011
EXHIBIT 42 - E-MAILS - NOVEMBER 29TH, 2011 135

Page 3

1 APPEARANCES:
2 For the Plaintiffs, THE WIMBLEDON FUND, SPC (CLASS TT):
3 COLE SCHOTZ
4 BY: JAMES W. WALKER, ESQ.
5 901 MAIN STREET, SUITE 4120
6 DALLAS, TEXAS 75202
7 (469) 557-9391
8 E-MAIL: JWALKER@COLESCHOLTZ.COM
9
10 For the Plaintiffs, THE WIMBLEDON FUND, SPC (CLASS TT):
11 COLE SCHOTZ
12 BY: ERIC S. LATZER, ESQ.
13 COURT PLAZA NORTH
14 25 MAIN STREET
15 HACKENSACK, NEW JERSEY 07601
16 (201) 525-6281
17 E-MAIL: ELATZER@COLESCHOTZ.COM
18
19 For the Defendants, KIA JAM:
20 LAW OFFICE OF DAVID WIECHERT
21 BY: DAVID WIECHERT, ESQ.
22 27136 PASEO ESPADA, SUITE B1123
23 SAN JUAN CAPISTRANO, CALIFORNIA 92675
24 (949) 361-2822
25 E-MAIL: DWEICHERT@AOL.COM

For the WITNESS, MAJID ZARRINKELK:

(IN PRO PER)

Also Present:

MICHELLE BARTFAY, VIDEOGRAPHER

Page 5

1 I N D E X (Continued)
2 E X H I B I T S
3
4 NUMBER DESCRIPTION PAGE
5 EXHIBIT 43 - E-MAIL - DECEMBER 8TH, 2011 143
6 EXHIBIT 44 - E-MAIL - JANUARY 20TH, 2012 152
7 EXHIBIT 45 - E-MAIL - SEPTEMBER 6, 2012 161
8 EXHIBIT 46 - E-MAIL - DECEMBER 6, 2013 173
9 EXHIBIT 47 - CERTIFICATION OF LACK OF RECORD FOR 181
SWARTZ IP SERVICES GROUP, INC.
10
11 EXHIBIT 48 - CERTIFICATION OF LACK OF RECORD 183
PINEBOARD HOLDINGS
12 EXHIBIT 49 - CERTIFICATION OF LACK OF RECORD FOR 186
INTEGRATED ADMINISTRATION
13
14
15 QUESTIONS NOT ANSWERED
16 (NONE)
17 INFORMATION REQUESTED
18 (NONE)
19
20
21
22
23
24
25

2 (Pages 2 to 5)

Page 6		Page 8	
00:00:02	1 LOS ANGELES, CALIFORNIA, TUESDAY, MARCH 26, 2019	10:31:28	1 subpoena. I received this part.
	2 AT 10:29 A.M.		2 Q Okay. And you're appearing today pursuant to
	3		3 the subpoena?
	4 THE VIDEOGRAPHER: Good morning. We are now on		4 A That's correct.
10:29:27	5 the record. My name is Michelle Bartfay. I'm a	10:31:33	5 Q Okay. And you're not represented by counsel
	6 certified legal video specialist working with		6 today?
	7 eLitigation Services, Inc. I'm not a relative nor		7 A That is correct.
	8 employee of any of the parties and have no financial		8 Q Okay. So to be clear, Mr. Migler does not
	9 interest in the outcome of this action.		9 represent you?
10:29:42	10 Today's date is March 26, 2019. The current	10:31:40	10 A That is correct.
	11 time is 10:29 a.m. Today's deposition is taking place		11 Q Okay. Have you ever been deposed before?
	12 at 10100 Santa Monica Boulevard, Los Angeles,		12 A Yes, I have.
	13 California. This is the videotaped deposition of Majid		13 Q Okay. How many times?
	14 Zarrinkelk. Consolidated case number is		14 A A few times. Two or three times.
10:30:06	15 2:15-CV-6633-CAS-AJWx in the entitled case matter is The	10:31:54	15 Q Two or three times?
	16 Wimbledon Fund versus Graybox LLC, et al. The court		16 A Yes.
	17 reporter today is Sandra Mitchell.		17 Q Okay. And when was the last time?
	18 Counsel, will you please introduce yourself and		18 A Winter of 2017 in New York. I was deposed by
	19 state whom you represent.		19 FBI, Department of Justice, and SEC.
10:30:28	20 MR. LATZER: Eric Latzer for the plaintiff.	10:32:17	20 Q Okay. And what was that with respect to?
	21 MR. MIGLER: William Migler for defendant,		21 A It was more or less related to same matter.
	22 Kiarash Jam.		22 Not entirely this case but matters of -- concerning
	23 MR. WALKER: Jim Walker for the plaintiff.		23 David Bergstein.
	24 THE VIDEOGRAPHER: And will the court reporter		24 Q Okay. And were there matters concerning
10:30:42	25 please swear in the witness.	10:32:41	25 Mr. Jam as well?
Page 7		Page 9	
10:30:42	1 THE REPORTER: Please raise your right hand.	10:32:42	1 A Mr. Jam was associated with Mr. Bergstein. So
	2 Do you solemnly swear in the cause		2 therefore, I'm Mr. Jam's CPA. And as a result of that,
	3 now pending to tell the truth, the		3 they deposed me on the issue.
	4 whole truth, and nothing but the		4 Q Okay. And so you traveled to New York for
10:30:42	5 truth so help you God?	10:32:56	5 that?
	6 MAJID ZARRINKELK,		6 A Yes, I did.
	7 having been duly sworn,		7 Q And you said that was in the winter of 2017?
	8 was examined and testified as follows:		8 A I believe it was -- if I'm not mistaken, it was
	9		9 October of 2017 again.
10:30:42	10 EXAMINATION	10:33:09	10 Q Okay. And approximately how long did that
	11 BY MR. LATZER:		11 meeting last?
	12 Q Good morning, sir.		12 A About seven hours.
	13 A Good morning.		13 Q Okay. One day?
	14 Q Can you please state your name for the record.		14 A One day.
10:31:00	15 A Majid Zarrinkelk.	10:33:19	15 Q And you provided testimony under oath?
	16 Q Okay. Mr. Zarrinkelk, I'm going to show you		16 A No. I don't believe that it was under oath.
	17 what's marked as Exhibit 33.		17 Q Okay. So was it an interview?
	18 (Exhibit 33 was marked for		18 A That's correct.
	19 identification by the Court Reporter		19 Q Okay. And what did you tell them about
10:31:16	20 and is attached hereto.)	10:33:45	20 Mr. Bergstein?
	21 BY MR. LATZER:		21 A Whatever they questioned me. It was
	22 Q Is this the notice of deposition with which you		22 seven hours of question, so I can't summarize it in one
	23 were served along with the subpoena issued in this		23 word.
	24 matter?		24 Q Okay. All right. We'll come back to that.
10:31:24	25 A I did not receive this part, but I received the	10:34:03	25 A Sure.

Page 10		Page 12	
10:34:03	1 Q Prior to that, what you've described as an	10:36:20	1 Q Okay. And with what other litigations have you
	2 interview, did you sit for -- strike that.		2 been involved other than this one?
	3 When was the last time you sat for a		3 A The same one that -- as I said, I went to New
	4 deposition?		4 York.
10:34:20	5 A Very long time ago. If I'm not mistaken, it	10:36:31	5 Q The criminal matter?
	6 was a case that an employee sued us, and we were deposed		6 A That is correct.
	7 by the attorney.		7 Q Anything else?
	8 Q Okay.		8 A No.
	9 A That's about 20 years ago.		9 Q Okay. Sir, do you hold any professional
10:34:36	10 Q Okay. Did you do anything to prepare for this	10:36:42	10 licenses?
	11 deposition today?		11 A Yes, I do.
	12 A No.		12 Q Okay. What kind of license?
	13 Q Okay. Did you speak to anyone about it?		13 A I am -- I'm a certified public accountant. I'm
	14 A I'm sorry, what?		14 also a certified cos- -- chartered management
10:34:47	15 Q Did you speak to anyone about it?	10:36:55	15 accountant. CGMA and CPA.
	16 A I spoke with Mr. Jam. I spoke with Mr. Jam's		16 Q Okay. What's a CGMA?
	17 attorney.		17 A It stands for Chartered Global Management
	18 Q Okay.		18 Accountant, I believe.
	19 A Just -- I informed them that I'm coming for		19 Q Okay. And what is -- what does that entail?
10:34:58	20 this deposition. Nothing beyond that.	10:37:15	20 How is that different than a CPA?
	21 Q And what did Mr. Jam say, if anything?		21 A Nothing. It's a -- it's just a title. After
	22 A He did not say nothing.		22 you've been a CPA for 25 years, they give you that --
	23 Q Okay. So you spoke to Mr. Jam sometime after		23 Q Okay.
	24 you received the subpoena?		24 A -- title.
10:35:09	25 A I -- I speak with Mr. Jam --	10:37:25	25 Q So how long have you had your CPA?
Page 11		Page 13	
10:35:12	1 Q Just let me finish the question.	10:37:27	1 A I have had this since 1987.
	2 A I'm sorry.		2 Q Okay. And you're licensed in California?
	3 Q You spoke with Mr. Jam sometime after you		3 A That's correct.
	4 received the subpoena?		4 Q Okay. And let me show you what's marked as
10:35:17	5 A That is correct. I spoke with Mr. Jam this	10:37:47	5 Exhibit 34.
	6 Monday or Tuesday. Well, let me see. Monday. He just		6 (Exhibit 34 was marked for
	7 came back and we speak frequently. I'm his business		7 identification by the Court Reporter
	8 manager. I handle his -- most of his financial matters.		8 and is attached hereto.)
	9 So therefore, we talk very frequently. And I mentioned		9 BY MR. LATZER:
10:35:41	10 to him that I am being subpoenaed and I'm coming for	10:38:00	10 Q Sir, I placed in front of you a document that's
	11 disposition -- for deposition.		11 entitled "Board of Accountancy Licensing Details for
	12 Q Okay. And what was his response to that?		12 47364."
	13 A Nothing.		13 Do you see that?
	14 Q He didn't say anything?		14 A That is correct.
10:35:52	15 A He said that he was coming to see you guys	10:38:13	15 Q I -- and I read that correctly?
	16 tomorrow.		16 A That is correct.
	17 Q Okay.		17 Q Okay. And the name that appears on this
	18 A That's all.		18 document is --
	19 Q Have you ever had a discussion with him about		19 A Najmadin.
10:36:00	20 this litigation?	10:38:20	20 Q Najmadin Zarrinkelk?
	21 A For the past two, three years that a lot of		21 A That is correct.
	22 litigation has been going on, I have been involved with		22 Q Is that you, sir?
	23 that. So therefore, that has been a lot of discussion		23 A That's me.
	24 about -- not only this -- all the matters that happened		24 Q Okay.
10:36:18	25 to him.	10:38:25	25 A Majid is my nickname. Najmadin is my real

Page 14		Page 16	
10:38:31	1 name.	10:40:49	1 another partner in addition to you two?
	2 Q Okay. Understood.		2 A No.
	3 And this provides an address of White Nelson		3 Q Has your accounting license ever been suspended
	4 Diehl Evans LLP.		4 before?
10:38:39	5 Do you see that?	10:41:02	5 A Never.
	6 A That's correct.		6 Q Okay. Have you ever been subject to a
	7 Q Okay. And that's the firm with which you're		7 disciplinary proceeding or any proceeding before the
	8 affiliated?		8 California Board of Accountancy?
	9 A We merged our practice with White Nelson Diehl		9 A Never.
10:38:50	10 Evans in November of 2017. I am a non-equity partner in	10:41:12	10 Q When did you first become acquainted with
	11 this firm. They bought our practice. And the -- the		11 Mr. Jam?
	12 matter that is concerning this issue is within -- with		12 A About 25 years ago.
	13 our firm, which is called Zarrinkelk Kashefipour. I		13 Q Okay. So in the 1990s?
	14 brought it, one of my bus- -- old business card. So you		14 A You could say early 1990s --
10:39:17	15 can make a note of that. This is my old card.	10:41:31	15 Q Okay.
	16 Q Thank you, sir.		16 A -- or mid-1990s.
	17 The firm was by the name of ZKCO?		17 Q And how did you become acquainted with him?
	18 A That is correct. ZKCO. ZKCO. We call it		18 A Mr. Jam is a brother of my brother's-in-law
	19 ZKCO.		19 sister -- wife, I'm sorry. My brother's-in-law's wife
10:39:29	20 Q And you were the principal of that firm?	10:41:46	20 is Mr. Jam's sister.
	21 A That is correct.		21 Q Your brother-in-law's wife is Mr. Jam's sister?
	22 Q Okay. And how many employees did ZKCO have?		22 A That's correct.
	23 A We were -- at the height of our practice, we		23 Q Okay. Okay. And Mr. Jam is a client of yours?
	24 were about 10, 11 people.		24 A He is.
10:39:44	25 Q Okay. And do you recall how many employees the	10:42:11	25 Q Okay. And when did he first become a client of
Page 15		Page 17	
10:39:48	1 firm had in 2011?	10:42:13	1 yours?
	2 A 2011, perhaps we were about -- including the		2 A As I said, about 20, 25 years ago.
	3 two partners, we were seven -- six or seven.		3 Q Okay. Do you know if Mr. Jam is currently
	4 Q How about 2012?		4 employed?
10:40:05	5 A Same number.	10:42:28	5 A Yes, I do.
	6 Q In 2013?		6 Q And how is he currently employed?
	7 A More or less the same.		7 A He does have a company called K.Jam Production.
	8 Q Okay. And among those six or seven people, how		8 Q Okay.
	9 many individuals were partners of the firm?		9 A And that's his principal business. He does
10:40:20	10 A Two were partners.	10:42:48	10 have some peripheral -- other entities, okay, which are
	11 Q And the rest were employees?		11 not very active. But K.Jam Production is the only
	12 A That's correct.		12 remaining active entity at this time. Prior to that,
	13 Q Okay. And the two partners were CPAs?		13 there was another entity called K.Jam Media, Inc.
	14 A That's correct.		14 Q What's the status of K.Jam Media, Inc.?
10:40:29	15 Q Do you remember the name of the other partner's	10:43:18	15 A K.Jam Media, Inc., as of now, is sort of a
	16 name?		16 defunct entity.
	17 A Of course. He's Mr. Hassan Kashefipour.		17 Q Okay. You said he had some peripheral entities
	18 That's the second last name.		18 other than K.Jam Production?
	19 Q Okay. So it was you and Mr. --		19 A That's correct.
10:40:44	20 A Kashefipour.	10:43:32	20 Q Can you identify those for me?
	21 Q Kashefipour?		21 A Sure. There is another entity called Emergent
	22 A That's correct.		22 Global Marketing, Inc.
	23 Q You were the two partners?		23 Q Okay. Any others?
	24 A That's true.		24 A There is one more that's very recent -- these
10:40:46	25 Q Was there ever a period of time where there was	10:43:48	25 two are very recent entities. It's called Astering

Page 18		Page 20	
10:43:51	1 Capital, A-S-T-E-R-I-N-G, Asterling Capital, Inc.	10:46:56	1 A That is correct.
	2 Q Okay. Any others?		2 Q And you've always prepared tax returns for his
	3 A These are the current entities that exist.		3 entities?
	4 Q Okay. There was a time when there were other		4 A That is correct.
10:44:09	5 entities --	10:47:01	5 Q And for him individually?
	6 A There were other entities in prior years that		6 A That is correct.
	7 they came along and they closed down and they dissolved		7 Q Okay. So -- and you've always helped him with
	8 and they disappeared.		8 matters outside strictly being a CPA?
	9 Q Okay. Let's talk about K.Jam Production.		9 A And again, financial matters.
10:44:21	10 A Uh-huh.	10:47:11	10 Q All financial matters?
	11 Q What type of business is that?		11 A Financial matters. I'm his financial advisor,
	12 A He's in a business of making movies.		12 if you will.
	13 Q Okay.		13 Q And that sort of relationship is permitted by
	14 A He's a movie producer.		14 the California Board of Accountancy as far as you
10:44:32	15 Q How about Emergent Global Marketing, Inc.?	10:47:28	15 understand?
	16 A The Global Marj- -- Marketing, Inc. is -- he is		16 A That's correct. That's correct. That's --
	17 associating himself with a group of young English		17 those are all within the boundaries of what a CPA does.
	18 investors that are trying to launch in crypt- --		18 Q Okay.
	19 cryptocurrency in United States.		19 A There are certain CPA firms that do nothing
10:44:59	20 Q Okay. And Asterling Capital, Inc.?	10:47:41	20 but -- they call it business management. And their job
	21 A Asterling Capital, Inc., honestly, is a very		21 is to manage the affairs of individuals. Especially in
	22 brand-new company and has had no transaction. And I		22 Los Angeles, there are plenty of people who are in the
	23 don't know the purpose of creating that. It was just		23 entertainment industry, and they need to have a
	24 formed a few months ago and has had pretty much -- and		24 financial person to handle their financial activity.
10:45:23	25 they opened up a bank account with \$100 and that's been	10:48:01	25 That's what they do.
Page 19		Page 21	
10:45:27	1 that.	10:48:03	1 Q Okay. And that's what you're doing?
	2 Q Okay. So what role, if any, do you have with		2 A More or less in a very limited -- because Kia
	3 respect to these three entities?		3 is not a celebrity or is not a mil- -- multimillionaire,
	4 A I manage all their activities in terms of		4 but I do pay his bills and I manage his funds.
10:45:46	5 receiving -- when the funds come into their bank	10:48:21	5 Q Okay. Do you do that for other clients as
	6 accounts, we record them. We do the accounting. And		6 well?
	7 then we prepare tax returns. And my role as his		7 A There are several other clients that we do that
	8 business manager sometimes goes beyond being a CPA. And		8 service for them, too.
	9 I help him with matters, mostly financial matters,		9 Q Okay. What percentage of your practice relates
10:46:10	10 outside that. Let's say, right now, for one example,	10:48:34	10 to Mr. Jam or entities with which he's affiliated?
	11 he's trying to refinance his home in order to pay off		11 A Right now, it's a very small portion of that.
	12 the tax liability that he owes to IRS. So I assist him		12 I would say something about -- in terms of dollars and
	13 in terms of going through the process of getting the		13 cents, I would say about \$100,000 of annual billing --
	14 loan and --		14 Q Okay.
10:46:35	15 Q Okay. Now, this sort of relationship that you	10:48:59	15 A -- al- -- altogether, all his entities.
	16 have with Mr. Jam now is -- have you always had that --		16 Q So you're saying that you receive approximately
	17 A I have --		17 \$100,000 in compensation for --
	18 Q -- relationship with him?		18 A That is correct.
	19 A That is correct. I've always had that		19 Q Just let me finish.
10:46:43	20 relationship.	10:49:08	20 You receive about \$100,000 in compensation for
	21 Q Okay. So you've always managed all of his		21 work that you provide him and that's \$100,000 received
	22 activities?		22 on an annual basis?
	23 A Financial ma- -- matters. That's correct.		23 A That's more or less --
	24 Q And you've always recorded funds coming in and		24 Q Okay.
10:46:54	25 out of accounts?	10:49:18	25 A -- the number.

Page 22			Page 24		
10:49:19	1	Q What percentage of your practice is that?	10:51:34	1	recall that you had a written engagement agreement with
	2	A It's about less than 5 percent.		2	Mr. Jam?
	3	Q Okay. Let's go back to 2011.		3	A I believe we do.
	4	A Uh-huh.		4	Q Now, do you recall whether you had separate
10:49:33	5	Q Approximately how much compensation were you	10:51:42	5	written engagement agreements for entities with which he
	6	receiving for work performed for Mr. Jam or entities		6	was affiliated and for whom you were providing services?
	7	with which he was affiliated?		7	A I believe we had a separate engagement.
	8	A I really don't recall exactly how much. This		8	Q And do you have that sort of arrangement today?
	9	is eight years ago, ten years ago.		9	A That is correct.
10:49:48	10	Q Understood.	10:51:55	10	Q Okay. So, for instance, you have a written
	11	Can you approximate?		11	engagement agreement with K.Jam Production?
	12	A I would say between, say, 100 and at most,		12	A We should.
	13	\$150,000. Nothing more than that.		13	Q And you have a separate one for Mr. Jam?
	14	Q Okay. And how about in 2012?		14	A That is correct.
10:50:04	15	A I would say it's -- it's -- around the same.	10:52:07	15	Q Okay. Let's talk about your practice and
	16	Q Okay. And 2013?		16	procedure for tax returns.
	17	A Same.		17	A Sure.
	18	Q And how was the compensation structured? How		18	Q Is it your practice to alert a client that
	19	did -- how was it determined that you would receive that		19	there's a deadline coming up for filing a tax return?
10:50:19	20	amount of income?	10:52:31	20	A That is correct.
	21	A We -- we keep time sheet and we bill the		21	Q Okay. Tell me how you alert the client of
	22	clients exactly like the attorneys do.		22	that.
	23	Q You bill by the hour?		23	A Of course, when we get close to tax season, in
	24	A That's correct.		24	case of clients like Mr. Jam that we prepare the
10:50:29	25	Q Okay. Did you have an engagement agreement	10:52:50	25	financial statement, there is not much I have to alert
Page 23			Page 25		
10:50:32	1	with Mr. Jam?	10:52:54	1	them because we generate the financial statements. So
	2	A If we had, it must have been a very old one.		2	we are in control as to what we need in order to do the
	3	Q Do you currently have one?		3	tax return. But in case of the clients that we don't
	4	A I believe we do have one, yes. Again, when we		4	prepare the tax -- financial statements or -- we start
10:50:49	5	moved to this new entity, new firm, I'm less involved in	10:53:11	5	to calling them around latter part of January, February,
	6	the administrative aspects of the business and more		6	depending on the size of the client. So we just give
	7	managing the clients.		7	them a -- a notification that we need your financial,
	8	Q Okay.		8	let's say, by February 15 in order to have your tax
	9	A But I believe we do have some sort of		9	return by March 15 deadline.
10:51:09	10	engagement. I -- I think I -- we do have something.	10:53:34	10	Q Okay. So is it your testimony that for a
	11	Q Is it your practice to have written engagement		11	client like Mr. Jam, for whom you were the business
	12	agreement with --		12	manager --
	13	A That's correct.		13	A Uh-huh.
	14	Q Just -- just let me finish.		14	Q -- that in order to file tax returns for his
10:51:17	15	A I'm sorry.	10:53:44	15	entities, you were to -- already had the information you
	16	Q Is it your practice to have written engagement		16	need?
	17	agreements with clients?		17	A That is correct.
	18	A That is correct.		18	Q Okay. And so would you nonetheless reach out
	19	Q Okay. And so back in the 2011 to 2013 time		19	to a client such as Mr. Jam and advise them that you
10:51:26	20	frame, do you recall that you had a written	10:53:56	20	were going to file a tax return --
	21	engagement --		21	A Well, of course.
	22	A I believe we do have.		22	Q Just let me finish.
	23	Q Just -- just let me finish.		23	A Okay. Sorry.
	24	A Oh, I'm sorry.		24	Q Would you nonetheless reach out to a client
10:51:30	25	Q Back in the 2011 to 2013 time frame, do you	10:54:03	25	like Mr. Jam and advise him that you are going to file a

Page 26		Page 28	
10:54:05	1 tax return on his behalf?	10:58:23	1 Mr. Bergstein and Mr. Bergstein was the boss, a very
	2 A Again, I don't file any tax return on my own.		2 shrewd -- and I'm trying to find the right word to
	3 I -- I'm legally required to get the approval of the		3 describe him. Ruthless boss. And then to -- to the
	4 taxpayer before I file their tax return. And they file		4 point that in a couple of our meetings that Kia and
10:54:20	5 a statement with me, they give me affidavit [sic]	10:58:53	5 Mr. Bergstein were present, whatever Kia was to speak,
	6 that -- affidavit, I'm sorry, that authorizes me to file		6 he would interrupt him. He would -- he did not mind to
	7 their tax return.		7 degrade him, dem- -- demising to -- anyhow, the
	8 Q And are there instances where a client who's		8 relationship was not a eye to eye. Let's put it this
	9 made aware of the tax filing deadline instructs you not		9 way.
10:54:44	10 to file a tax return?	10:59:25	10 Q And did you think Mr. Bergstein was bullying
	11 A That has never been in my -- my --		11 Mr. Jam?
	12 Q There has never been?		12 A If Mr. Bergstein was not bullying him -- but
	13 A Never been. I don't do work for people that		13 he -- he had a total control over what Mr. Jam was
	14 don't file tax return.		14 doing, absolutely. No doubt in my mind.
10:54:55	15 Q Okay. And that's true for Mr. Jam?	10:59:42	15 Q Okay. So between --
	16 A Absolutely.		16 A He had -- he had no control. Jam had no
	17 Q And it's true for Mr. Jam's entities?		17 control over what Bergstein was doing. Although
	18 A Of course.		18 everything was under his name, under Kia's name but Kia
	19 Q Okay. So you're familiar with an individual		19 had no control over -- none -- none whatsoever. Not --
10:55:27	20 named David Bergstein?	10:59:58	20 not have a say in what -- what to do.
	21 A I know of him.		21 Q Why did Mr. Jam have no control, as you've
	22 Q Okay. And how did you become familiar with		22 described it?
	23 Mr. Bergstein?		23 MR. MIGLER: Calls for speculation.
	24 A I think in late decade of 2000, Mr. Jam was		24 BY MR. LATZER:
10:55:56	25 acquainted with a gentleman named David Bergstein. I --	11:00:09	25 Q You can answer.
Page 27		Page 29	
10:56:00	1 I -- I'm -- I can't exactly pinpoint the date, but I	11:00:09	1 A That was my understanding, period. That he had
	2 think it was latter part of 2010, in -- in the decade of		2 no control because all the orders were coming from --
	3 2010. And so he became involved with him and they		3 the orders that related to the matters that I was
	4 worked together in the same building, somewhere here in		4 involved with was coming from David.
10:56:23	5 Los Angeles.	11:00:28	5 Q Okay. So you said before that you had met
	6 Q So you understood that they were business		6 Mr. Bergstein four times?
	7 associates?		7 A That's correct.
	8 A This is what my understanding of the		8 Q Are you referring to four in-person meetings?
	9 relationship was. David Bergstein was involved in too		9 A The -- this four times is two business meeting.
10:56:42	10 many lawsuits, significant lawsuit. In one meeting that	11:00:44	10 One meeting was meeting me and Jam and David at their
	11 I had with Kia and Mr. Bergstein, he boasted that he is		11 breakfast and the last time that I met him was at Kia's
	12 paying \$21 million in legal fee in order to defend		12 wedding.
	13 himself. That's -- that's what I recall from my		13 Q When was that?
	14 meeting. Overall, I've met Mr. Bergstein four times		14 A November of 2014, if I'm not mistaken.
10:57:14	15 altogether in this many, many years. And so therefore,	11:01:14	15 Q Okay. So Mr. Jam invited Mr. Bergstein to his
	16 he made -- because of the relationship, whatever their		16 wedding?
	17 relationship was, Mr. Jam became the front man for		17 A That is correct.
	18 Mr. Bergstein. And Mr. Jam, being such a gentleman, he		18 Q Okay. And, yeah, if we could focus on the 2011
	19 never realized that he was getting into -- he was being		19 to 2013 time per- -- period.
10:57:53	20 a front person for unsavory person. That's -- that's	11:01:30	20 A Uh-huh.
	21 all I can say. I don't know if unsavory is the right		21 Q Did you believe that Mr. Jam was not acting
	22 word.		22 voluntarily?
	23 Q Okay. What is that understanding based on?		23 A In what sense when you say "voluntarily"?
	24 A Through the course of these years, I saw that		24 Q In his interactions with Mr. Bergstein, was he
10:58:17	25 Mr. Jam was acting more or less like a employee of	11:01:43	25 not acting voluntarily?

Page 30	Page 32
<p>11:01:46 1 A Of course, Mr. Jam is a grown-up man. And I 2 don't believe that a grown-up man does anything 3 unvoluntarily. 4 Q Okay. 11:01:56 5 A They -- they act on their own. But I have no 6 doubt that on business decision-making, especially 7 relating to matters that involved David, he had no say, 8 none -- none whatsoever. 9 Q And you said before that Mr. Jam didn't realize 11:02:19 10 that Mr. Bergstein was -- I think you described him as 11 an unsavory character. 12 Do you recall that testimony? 13 A That's correct. 14 Q Okay. Did you realize he was an unsavory 11:02:28 15 character? 16 A Not at the beginning. As these stories start 17 to evolve, then we realized that how he is. 18 Q You realized that? 19 A That's correct. 11:02:39 20 Q Okay. So when was that? 21 A Maybe in the last three, four years -- 22 Q Okay. 23 A -- that all these issues came up. And then we 24 realized that he was not a straightforward person at -- 11:02:58 25 at least in terms of business dealings.</p>	<p>11:04:34 1 none of them, I don't recall that his name was on the 2 list of the directors or owners, but I knew that they 3 were related to him. 4 Q Okay. So was Mr. Bergstein the one who was 11:04:52 5 paying you for the 5- to \$10,000 of work? 6 A I believe it came from those entities. One was 7 called Sovrin. And I think I did one year of tax 8 return. I did not do the financial statement, but he 9 asked -- he or Kia -- through Kia asked me to do the tax 11:05:11 10 return and I did that. 11 Q Any other entities that you recall doing that 12 for? 13 A Again, these are -- goes back many years ago. 14 There is another company come to my mind called Managed 11:05:29 15 Media. I am not sure whether I ever did tax return for 16 it, but I do recall the name. 17 Q Okay. So let me ask you again. 18 Did you, at any point in time, have a signed 19 written engagement agreement with Mr. Bergstein? 11:05:45 20 A No. Not with Mr. Bergstein himself. 21 Q Did you have a signed written engagement 22 agreement with Sovrin? 23 A We -- when we prepared a tax return, we prepare 24 an engagement letter. And that engagement letter, I 11:06:01 25 believe, was signed by Kia, not by David. David</p>
Page 31	Page 33
<p>11:03:01 1 Q Okay. So for a certain period of time, you 2 thought he was a straightforward person? 3 A I -- I never had any business relationship with 4 him, so I -- I never judged him until this issue came 11:03:16 5 up. 6 Q Okay. So Mr. Bergstein was -- was never a 7 client of yours? 8 A Absolutely not. 9 Q And he was never a client of your firm? 11:03:23 10 A No. 11 Q You never had a written engagement agreement 12 with Mr. Bergstein? 13 A I had done few various product work for 14 Mr. Bergstein's companies, just a few tax return, very 11:03:38 15 tiny. He -- I -- I believe he came to me in one of 16 these years and asked me, "Can you prepare this tax 17 return? I needed to file it because I have to resurrect 18 an entity, which was the" -- in California, we call it 19 the -- the company that loses its power to do business. 11:04:05 20 So in order to revive it, you have to file a tax return. 21 So I did that. 22 And if I'm not mistaken, overall this many 23 years that David Bergstein was behind the scene, I don't 24 think that I did more than 5- to \$10,000 work overall 11:04:27 25 for the entities that he had some affiliation. Under</p>	<p>11:06:06 1 never -- I never saw David's signature in any document. 2 Q So Mr. Jam was signing an engagement agreement 3 for work that you understood that was going to be 4 performed for Mr. Bergstein? 11:06:21 5 A Again, it's this -- these are those entities 6 that were Mr. Bergstein's entities. Okay? And I 7 linked -- the link between me and David Bergstein was 8 Kia Jam. So Kia would have come to me and said, "Majid, 9 can you do this tax return?" And I would say yes or no. 11:06:40 10 Q Okay. And so how did you understand, for 11 instance, for Sovrin that Bergstein had a relation to 12 that company? 13 A The first meeting that we had back, I believe 14 it was -- again, you're asking me for something that's 11:06:56 15 ten years ago and eight years ago. And in that meeting, 16 there was a list of entities. It was about 50, I 17 believe, if I'm -- I'm not mistaken. They were talking 18 about 50 different entities that -- owned by David. 19 David was a manager. David was a director or whatever. 11:07:27 20 I -- I -- I don't recall what they were. But we 21 discussed those companies in a meeting that we had up 22 here in L.A. 23 Q That -- so that was a meeting that involved 24 you, Mr. Bergstein, and Mr. Jam? 11:07:43 25 A It was me and Mr. Jam. It was -- and</p>

Page 34		Page 36	
11:07:49	1 Mr. Bergstein. And if I'm not mistaken, there were a couple of other gentlemen in -- in -- in there.	11:10:49	1 doing financials for those entities. I think that was the purpose of that meeting.
	2	2	
	3 Q Okay. And what was discussed with respect to those entities that you described?	3	Q Okay. And Mr. Jam and Mr. Bergstein requested that you attend this meeting?
	4	4	
11:08:15	5 A We were -- I'm not quite sure what we were discussing. They had all these entities and we were thinking of -- at -- at first I thought that we were going to be in charge of handling those entities.	11:11:02	5 A That is correct. I -- I came from Orange County, and we had a meeting in their office here.
	6	6	
	7	7	Q Which office are you referring to?
	8	8	A The -- the -- they had an office here on Colorado Boulevard.
	9	9	
11:08:42	10 That's -- that was -- if I'm not mistaken, that was the impression that I got. So we met with Kia and David to sort that out and then we realized that, no, they did not want us to do that and I'm glad that we never did that.	11:11:14	10 Q That's the office that you shared?
	11	11	A That is correct.
	12	12	Q Okay. And so what was decided with respect to how things would work going forward with these entities?
	13	13	
	14 Q Okay. So you said they had all these entities.	14	A In -- in that meeting, I believe it was -- it was made clear that I'm not going to be involved in any of those entities. That was it. So I left.
11:08:58	15 Are you referring to Mr. Jam and Mr. Bergstein?	11:11:26	15
	16 A The entities list was Mr. Bergstein entities, not Kia Jam's entities. Because Kia -- whenever Kia formed an entity, I was the first one that knew about it.	16	
	17	17	Q Okay. It was a decision made with respect to your involvement with other entities that were not --
	18	18	
	19	19	A No.
11:09:12	20 Q Okay.	11:11:42	20 Q -- on that list?
	21 A Those entities were formed. They were there. There was a list of companies that was discussed in that meeting or at least I saw them -- their name on a piece of paper.	21	A No. No. There was no other entities that I was involved with. The only entities that I was involved with was the ones that Kia was -- there was one entity that -- called Administrative -- Integrated Administration that was formed in this -- in or about
	22	22	
	23	23	
	24	24	
11:09:23	25 Q Okay. So you refer to "they."	11:11:57	25
Page 35		Page 37	
11:09:25	1 Who are you referring to?	11:12:05	1 the same time. This entity was a payroll company. And we were running the payroll for their employees. And this entity had payroll of several of David's company's people in there, so I knew about that entity.
	2 A Kia and David Bergstein.	2	
	3 Q Okay. So I'll ask you again. You said they had all these entities.	3	
	4	4	
11:09:38	5 Are you referring to Mr. Jam and Mr. Bergstein together --	11:12:28	5 Q And that was one of the entities on the list?
	6	6	A That was one of the entities -- I'm not 100 percent sure that that entity was on that list, but it was discussed that day.
	7 A No.	7	
	8 Q -- having these entities?	8	
	9 A That -- those entities were not Kia Jam's entity. If Kia had any entity, I was involved.	9	Q Okay. So I'm just trying to get a better understanding of what was discussed at this meeting.
11:09:45	10	11:12:49	10 So did Mr. Bergstein ask you to manage the finances for these entities?
	11 Q So your understanding is that Mr. Jam had no affiliation whatsoever with these entities on the list?	11	
	12	12	A No.
	13 A That is correct.	13	
	14 Q Okay.	14	Q No?
11:09:58	15 A As much as I know, if Mr. Jam had some knowledge or had some association be- -- beyond my lo- -- knowledge, then I can't say anything about it. But all the entities that Kia was owner or major owner, I was involved with them. I knew about it.	11:13:00	15 A No.
	16	16	Q But there was a discussion about the possibility that you would?
	17	17	
	18	18	A No. This was a misunderstanding. Or the meeting was to clarify whether I was going to be taking over those entities in terms of managing their finances. And as we left the meeting, we realized that, no, there was no intention, and David had his own accountant and his own friends and his own companies. I never touched any of his entities.
11:10:25	20 Q So what did Mr. Bergstein -- strike that.	11:13:11	20
	21 How did Mr. Bergstein want to involve you with respect to these entities?	21	
	22	22	
	23 A I -- I -- I -- I don't think that he wanted to get me involved. This was a meeting that we set up or they invited us to discuss whether -- who is going to be	23	
	24	24	
11:10:45	25	11:13:34	25 Q Okay. And why was that dec- -- decision

Page 38		Page 40	
11:13:37	1 reached?	11:15:54	1 Q Let me just finish.
	2 A Why?		2 Your testimony is that those are the only
	3 Q What prompted that decision?		3 monies he received between 2011 and 2013 from entities
	4 MR. MIGLER: Calls for -- calls for		4 with which either he or Mr. Bergstein was affiliated?
11:13:41	5 speculation.	11:16:06	5 A That is my understanding that he never received
	6 THE WITNESS: That's not my -- that was not my		6 any compensation from David Bergstein for his services
	7 call. They would -- that was their call so --		7 except those salaries. There were a bunch of money
	8 BY MR. LATZER:		8 coming in and going out in that K.Jam Media. And
	9 Q That's what Mr. Jam and Mr. Bergstein decided?		9 that -- if you would like, we can explore more about
11:13:51	10 A I -- I -- I don't think that even Mr. Jam	11:16:29	10 that. But to this date, I don't believe that Mr. Jam
	11 decided. It was David's decision that he wanted to have		11 benefited any- -- anything -- anything. In fact,
	12 his own -- he never approached me. David never		12 Mr. Bergstein left more than \$1 million balance on
	13 approached me to be involved with his entities or do any		13 Mr. Jam's American Express credit card, \$500,000 on his
	14 tax returns or any- -- anything like that.		14 JPMorgan card, and almost \$800,000 in payroll taxes for
11:14:11	15 Q Well, I thought you testified before that you	11:17:05	15 IA entity that he did not pay. So they are -- all
	16 did prepare tax returns for at least Sovrin and Managed		16 became Mr. Jam's personal obligation because Mr. Jam's
	17 Media?		17 name was on those accounts.
	18 A That -- that is correct. Except those minor		18 Q Okay. Have you -- have you personally ever
	19 one. He never approached me to say, "Majid, come in and		19 entered into a business transaction with Mr. Bergstein?
11:14:24	20 help me to do financial statements or tax returns for my	11:17:20	20 A No.
	21 entities."		21 Q Okay. How about your firm?
	22 Q This -- the relationship you described before		22 A No.
	23 as one that Mr. Bergstein was -- I think your words were		23 Q Have you ever --
	24 "controlling Mr. Jam"?		24 A Except -- except those few small entities that
11:14:37	25 A That is correct.	11:17:30	25 I mentioned.
Page 39		Page 41	
11:14:38	1 Q Did you describe that to the government when	11:17:31	1 Q Okay. Have you ever loaned money to
	2 you met with them --		2 Mr. Bergstein --
	3 A That is correct.		3 A Yes, I did.
	4 Q Let me just finish.		4 Q Excuse me. Let me just finish.
11:14:43	5 Did you describe that to the government when	11:17:35	5 Have you ever loaned money to Mr. Bergstein or
	6 you met with them in 2017 in New York?		6 one of his entities?
	7 A That is correct.		7 A I loaned \$225,000 to Mr. Bergstein.
	8 Q Okay. Now, Mr. Jam, as a result of his		8 Q And when was that?
	9 relationship with Mr. Bergstein, was benefiting		9 A April 9th, 2014.
11:15:01	10 financially; is that correct?	11:17:49	10 Q And what prompted you to loan money to
	11 A Absolutely not.		11 Mr. Bergstein at that time?
	12 Q How -- how was he not benefiting financially?		12 A Stupidity.
	13 A Mr. -- Mr. Jam not only did not benefit.		13 Q Okay. Did you have a written loan agreement
	14 Mr. Bergstein ruined his life. And Mr. Jam is in the		14 with Mr. Bergstein?
11:15:17	15 most difficult financial situation today as it has ever	11:18:02	15 A No.
	16 been before meeting David Bergstein.		16 Q Did you receive any collateral?
	17 Q Did Mr. Jam, between 2011 and 2013, receive		17 A No. Afterwards, we drafted a note a year or
	18 monies from entities with which either he or		18 two later that I still haven't.
	19 Mr. Bergstein was affiliated?		19 Q Did you ever get paid back on that loan?
11:15:40	20 A He received salary from -- for a short period	11:18:17	20 A A portion of that.
	21 of time from IA or Integrated Administration. That was		21 Q How much?
	22 the only time.		22 A I believe I received about -- if I'm not
	23 Q That -- your testimony is that's the only money		23 mistaken, about \$150,000 of that back from him and a
	24 he ever received from entities that --		24 portion of that was paid back by Mr. Jam through K.Jam
11:15:52	25 A I did not say that's only --	11:18:39	25 Media. And if I am correct, there is -- \$46,500 of that

Page 42		Page 44	
11:18:48	1 loan has not yet been paid.	11:21:44	1 described before?
	2 Q What prompted that loan? Did Mr. Bergstein		2 A To this day, I have not. And I -- I really
	3 come to you?		3 don't know why Kia chose to associate himself with
	4 A No. I came to the office on April 9 at the		4 David. Kia has always been the most pristine,
11:18:58	5 height of my season. I received a e-mail from David	11:22:05	5 straightforward, honest guy that I've ever seen. And
	6 asking for \$225,000 advance for three days. And me		6 then working with somebody like David Bergstein, it
	7 being stupid Majid, I -- I gave it to him --		7 was -- to me, it was just opposite of his character.
	8 Q Did this --		8 Q Did you ever have a discussion with Mr. Jam
	9 A -- with the hope that he's going to pay it back		9 regarding this relationship as con- -- of control, as
11:19:21	10 in three days.	11:22:27	10 you described it?
	11 Q Did you see what the loan money was for?		11 A After things had started to go south, yes.
	12 A He -- I -- I think he said that he was going to		12 Q When was that?
	13 make a payment to his attorneys for attorney fee. I		13 A After he -- I think -- I think when he put that
	14 think. I'm not 100 percent sure. But I do have a copy		14 million-dollar charge on Kia's account, that concerned
11:19:37	15 of the communication, the e-mails. There was just a few	11:22:50	15 me very much. So I brought it up and he said, "Don't
	16 e-mails back and forth.		16 worry. He's going to pay back." And then he never did
	17 Q And so the \$225,000, did that come from your		17 that. And at -- at that point of time, things -- then I
	18 firm?		18 started to doubt about character of the -- David
	19 A No. It came from me.		19 Bergstein.
11:19:49	20 Q You personally?	11:23:08	20 Q What million-dollar charge are you referring
	21 A That's correct.		21 to?
	22 Q Did you write him a check?		22 A Kia had a black American Express. And as you
	23 A I've wired the fund to him.		23 know -- or I'm told that those cards don't have any
	24 Q Okay. So at this point in time in April 2014,		24 limit. And in a very short period of time, if I recall
11:20:02	25 you had become familiar with Mr. Bergstein through his	11:23:26	25 it correctly, there was about a million-dollar charge
Page 43		Page 45	
11:20:05	1 relationship with Mr. Jam?	11:23:31	1 went through that credit card and then it never been
	2 A Uh-huh.		2 paid. They paid a portion of that. And then at the
	3 Q Okay. And by that point, did you believe that		3 end, there was \$700,000 of that was left. Then I got
	4 Mr. Bergstein was, as you described him before, an		4 into a negotiation with American Express. We settled it
11:20:14	5 unsavory character?	11:23:48	5 for 300-some thousand dollars. And the last payment of
	6 A At that point of time, nothing was happening.		6 that was done about -- about October of 2018.
	7 Everything was going well. The businesses were being		7 Q With respect to the conversation that you had
	8 conducted. As much as I knew, they're very transparent,		8 with Mr. Jam after things went south, as you described
	9 so I had no reason to believe that Mr. Bergstein is a --		9 before, that conversation concerned your perception that
11:20:39	10 is not a trustworthy person, I should say.	11:24:16	10 Mr. Bergstein was controlling Mr. Jam?
	11 Q Okay. And at that point in time, did you		11 A I've always had that -- again, at that first
	12 believe that Mr. Bergstein was, as you described		12 meeting, I -- I got that sense that in this
	13 earlier, controlling Mr. Jam?		13 relationship, he's the boss and Kia has no -- no say.
	14 A Oh, yes. I saw that in that meeting, the first		14 Q But the first time that you raised that with
11:20:57	15 meeting, which -- I believe it goes back to 2011, 2012.	11:24:33	15 Ms. -- with Mr. Jam was when things went south, was your
	16 Q Did that concern you?		16 testimony before?
	17 A I was -- I was a bit surprised to see, because		17 A I -- I believe that's -- that's when we started
	18 Kia is a very strong character himself. And when I saw		18 to discuss that. I was just warning him that, "Hey, do
	19 the way they communicated, it was -- disappointed me a		19 you realize that these charges are beyond your means and
11:21:20	20 little bit as to why Kia is taking -- I -- I don't want	11:24:50	20 you are not going to be able to pay that?"
	21 to use the word "abuse," but it was not a eye to eye,		21 He said, "No. These are not mine. These are
	22 two colleague talking to each other. It was a boss who		22 David's. He's going to pay it, so don't worry."
	23 was talking down to --		23 Q Okay. And so approximately when was that?
	24 Q Did -- did you at any point gain an		24 A I think it should have been '14, '15, or
11:21:41	25 understanding why Mr. Jam was taking that, as you	11:25:09	25 even -- it might be even '13 -- '13, '14, '15. I -- I

Page 46		Page 48	
11:25:12	1 don't recall exact date when the -- those charges came	11:37:51	1 or bookkeeping department. They would record those
	2 through.		2 transactions.
	3 MR. LATZER: Okay. Let's take a short break.		3 Q And it's your understanding that Mr. Jam was
	4 THE VIDEOGRAPHER: The time is 11:25 a.m. We		4 generally using this American Express card for personal
11:25:22	5 are now off the record.	11:38:06	5 expenses; is that correct?
	6 (A recess was taken.)		6 A I did not say that.
	7 THE VIDEOGRAPHER: We are back on the record.		7 Q Okay. Was he using the American Express card
	8 The time is 11:35 a.m.		8 for personal expenses?
	9 BY MR. LATZER:		9 A There could have been some personal expenses.
11:35:58	10 Q Sir, before we begin, again, I just want to ask	11:38:17	10 We are very careful as to how to record the personal
	11 you again, please wait until I finish my question before		11 expenses and not to mingle them with the business
	12 you respond.		12 expenses.
	13 A Sure.		13 Q Okay. And whose name was the black card in?
	14 Q We're -- we're spending a lot of money for a		14 A Kia Jam.
11:36:09	15 videotaped deposition and we want to make sure --	11:38:32	15 Q Okay. So was it his personal credit card?
	16 A Sure.		16 A I believe it was his business credit card.
	17 Q -- it's a clean record. Thank you.		17 Q But your testimony is that in certain
	18 A Sure.		18 instances, he used it for personal expenses?
	19 Q Before we broke, you testified regarding a		19 A There could have been some personal expenses in
11:36:18	20 \$1 million charge that was made on Mr. Jam's black Amex	11:38:49	20 there.
	21 card; is that correct?		21 Q Okay. And do you have an understanding as to
	22 A That is correct.		22 how Mr. Bergstein was able to gain access to this card?
	23 Q Okay.		23 A I believe he had the second copy of the card or
	24 A About a million dollar. It could have been		24 Kia got a copy for him.
11:36:27	25 800,000, but something like that. It was a big number.	11:39:03	25 Q Okay.
Page 47		Page 49	
11:36:33	1 Q Okay. And your testimony was that	11:39:03	1 A It was not that he was using cre- -- his card.
	2 Mr. Bergstein caused this charge to be made; is that		2 It was Kia's card and the second copy was obtained for
	3 correct?		3 David. That was my understanding.
	4 A That's correct.		4 Q And Mr. Jam -- strike that.
11:36:42	5 Q Okay. And do you re- -- do you know what the	11:39:17	5 So Mr. Jam voluntarily gave Mr. Bergstein a
	6 \$1 million charge was for?		6 copy of the credit card?
	7 A They were -- if I recall correctly, a bunch of		7 A I don't think that anybody can force someone to
	8 antiques he purchased, he bought different items that		8 go and get a card for someone else.
	9 we -- we never knew what they were.		9 Q Okay. So Mr. Bergstein was authorized to use
11:37:04	10 Q Okay. Now, did you have access to the monthly	11:39:34	10 the card?
	11 statements for this Amex card?		11 A That is correct.
	12 A Yes, we did.		12 Q But your testimony is that this 1 million or so
	13 Q And you had that in your capacity as the		13 charge was unauthorized?
	14 manager for Mr. Jam?		14 A I did not say that. I said when he run those
11:37:21	15 A I did.	11:39:44	15 charges, it came outrageous to us, unexpected to us.
	16 Q Okay. And did you review those monthly		16 Q There were instances, though, before then where
	17 statements?		17 Mr. Bergstein had run charges on that card; is that
	18 A I -- I wouldn't say that I would review the		18 correct?
	19 monthly statement, but I would receive them. We were		19 A I don't recall that there were charges that --
11:37:34	20 making payments towards them. And I was aware of those	11:40:03	20 that big in -- in one month. There were charges coming
	21 charges.		21 from his side but this was a -- a period of time, I
	22 Q Okay. And did those statements come to you		22 believe, it was a month or two and all of a sudden, he
	23 every month?		23 put these much charges on the card.
	24 A They would come in the mail and then we		24 Q Okay.
11:37:47	25 would -- I would have given it to our accountant or --	11:40:27	25 A Again, these are six, seven, eight years ago

Page 50	Page 52
<p>11:40:31 1 and my memory does not serve me absolutely precisely in</p> <p>2 order to respond to all these questions. So please</p> <p>3 don't take my word as absolute, you know.</p> <p>4 Q Okay.</p> <p>11:40:41 5 A Because I just want to make sure that you</p> <p>6 understand that I'm utilizing my memory of several years</p> <p>7 ago and I handle 5-, 600 clients, so I don't remember</p> <p>8 everybody's credit card, everybody's charges,</p> <p>9 everybody's transactions. So therefore, I want you to</p> <p>11:41:03 10 be aware of that fact.</p> <p>11 Q Okay. Are you familiar with an entity called</p> <p>12 Swartz IP Services Group, Inc.?</p> <p>13 A I heard about the name.</p> <p>14 Q Okay. And are you aware that it, at one point,</p> <p>11:41:17 15 changed its name to Advisory IP Services, Inc.?</p> <p>16 A I did not know about that.</p> <p>17 Q Okay. So how did you become familiar with</p> <p>18 Swartz IP Services?</p> <p>19 A In the midst of -- I believe it was 2012 or</p> <p>11:41:35 20 '13, then there was a bunch of big numbers started to</p> <p>21 come in and go out. And amongst those were some</p> <p>22 identified as -- what was the name -- Swartz. And we</p> <p>23 recorded that as loan from Swartz.</p> <p>24 Q Okay. So you said that there were some big</p> <p>11:42:07 25 numbers that started to go in and go out?</p>	<p>11:43:35 1 Q Okay. I'm -- I'm going to ask it again. I'm</p> <p>2 trying to understand this flow of monies that you're</p> <p>3 referring to here.</p> <p>4 Into what account were these monies going from</p> <p>11:43:49 5 Swartz IP?</p> <p>6 A Most of them, if I recall correctly, they were</p> <p>7 coming to IA --</p> <p>8 Q Okay.</p> <p>9 A -- and to K.Jam Media.</p> <p>11:44:02 10 K.Jam Media became, quote-unquote, David's</p> <p>11 company. So we tried to keep K.Jam production purely</p> <p>12 for Kia and K.Jam Media purely for Kia's business with</p> <p>13 David.</p> <p>14 Q Okay. So you said with respect to K.Jam Media,</p> <p>11:44:27 15 that was going to be used for Kia's business with David?</p> <p>16 A That is correct.</p> <p>17 Q What business are you referring to?</p> <p>18 A Any transaction that was coming and going, and</p> <p>19 the money was coming into K -- K.Jam Media account or IA</p> <p>11:44:43 20 account. We were not advised what to expect. We would</p> <p>21 open the bank account and see there is a half-million</p> <p>22 dollars or \$200,000 or \$100,000 money in there. And we</p> <p>23 would ask what it is, and the answer would either come</p> <p>24 that day, say, "We don't know it yet" or "We know</p> <p>11:45:06 25 later." And then we would put it in a suspense account</p>
Page 51	Page 53
<p>11:42:10 1 A That is correct.</p> <p>2 Q And from where are you referring?</p> <p>3 A What do you mean where?</p> <p>4 Q Where are these big numbers going in and going</p> <p>11:42:15 5 out?</p> <p>6 A The funds were coming in and going out, okay?</p> <p>7 And some of them are 100,000, 200 million, 2 million,</p> <p>8 you know, in a period of a -- span of perhaps a year or</p> <p>9 six months. Again, I'm not 100 percent sure what was</p> <p>11:42:32 10 the length of the period of time that these fund --</p> <p>11 these money were coming in and going out.</p> <p>12 Q Okay. I'm just trying to understand from where</p> <p>13 they were coming in and going out.</p> <p>14 Are you referring to a particular account?</p> <p>11:42:44 15 A They were coming from different sources. At</p> <p>16 the time that the money were coming in, we were not told</p> <p>17 what they were for. So if you'll go back in -- I</p> <p>18 believe we filed K.Jam Media tax return about a year or</p> <p>19 two later. We filed the tax return and I attached the</p> <p>11:43:10 20 statement to this tax return. I said, "Our records are</p> <p>21 not complete to file a comprehensive tax return."</p> <p>22 And then the second meeting that we had with</p> <p>23 David, I believe, was to identify as to what are these</p> <p>24 funds that are coming and going, where are they coming</p> <p>11:43:32 25 from and where are they going to.</p>	<p>11:45:11 1 until we discovered as to what was the source of that</p> <p>2 income or that money coming in.</p> <p>3 Q Okay. What was your understanding at the time</p> <p>4 of the business that Mr. Jam and Mr. Bergstein were</p> <p>11:45:22 5 involved in?</p> <p>6 A I understood that David Bergstein was involved</p> <p>7 in so many different businesses. One of which was it</p> <p>8 was his forte. He would buy entities that they were in</p> <p>9 financial difficulties and he would revive them and he</p> <p>11:45:47 10 would sell them. That's -- that's -- perhaps he told me</p> <p>11 or I got the impression of. But during this period of</p> <p>12 perhaps ten years that I've known David, I don't think</p> <p>13 that any of the entities that he created or he worked</p> <p>14 turned out to be successful business. They all ended up</p> <p>11:46:17 15 being delinquent in paying their taxes, delinquent</p> <p>16 paying -- paying their debts, and just -- just -- it was</p> <p>17 a chaotic situation.</p> <p>18 Q Okay. So you understood at the time that</p> <p>19 Mr. Bergstein had some involvement with businesses that</p> <p>11:46:35 20 would purchase distressed assets. Is that fair to say?</p> <p>21 A Again, in one -- I think in that meeting that</p> <p>22 Kia and I and him we had. It was in June of 2014</p> <p>23 because he had told me that he's going to pay my money</p> <p>24 back and he did not. So I ask Kia to set up a meeting,</p> <p>11:47:01 25 so we went for a breakfast meeting.</p>

Page 54	Page 56
<p>11:47:03 1 In that meeting, he -- he told me about this</p> <p>2 \$20 million legal fee and a story of that, and then in</p> <p>3 that meeting, he said, "Majid, I am buying a big company</p> <p>4 in San Bernardino. The jo"- -- "this company, what it</p> <p>11:47:22 5 does is to bring airplanes and repair them and sell</p> <p>6 them." And then he sought whether I can bring investors</p> <p>7 for him and I never did that.</p> <p>8 Q Okay. So that was in 2014?</p> <p>9 A I think it was 2014.</p> <p>11:47:41 10 Q Let's go back to the 2011, 2012 time frame when</p> <p>11 you're seeing all these monies, millions of dollars as</p> <p>12 you described --</p> <p>13 A Oh, I did not say that those monies come in in</p> <p>14 2011 or 2012.</p> <p>11:47:54 15 Q Let -- let me finish.</p> <p>16 Let's go back to the 2011, 2012 time frame.</p> <p>17 A Uh-huh.</p> <p>18 Q And you understood at that time that</p> <p>19 Mr. Bergstein and Mr. Jam were in business together; is</p> <p>11:48:05 20 that correct?</p> <p>21 A No. Mr. Bergstein and Mr. Jam were not in</p> <p>22 business together ever.</p> <p>23 Q They were never in business together?</p> <p>24 A I don't think that they were ever to business</p> <p>11:48:15 25 together.</p>	<p>11:49:48 1 been recorded one at a time with exact date, with its</p> <p>2 source of incoming fund and the source of outgoing</p> <p>3 funds.</p> <p>4 Q Did you gain an understanding at that time as</p> <p>11:50:01 5 to why this money was coming in from Swartz IP?</p> <p>6 A I have no clue as to why their -- those funds</p> <p>7 were coming in and they were going out except the fact</p> <p>8 that I felt that Mr. Bergstein was using K.Jam Media as</p> <p>9 a vehicle of bringing these funds in and out. And at</p> <p>11:50:22 10 that point of time, to be honest with you, I had no</p> <p>11 reason to believe that they were doing anything wrong or</p> <p>12 anything illegal or -- and so therefore, my question was</p> <p>13 like any accountant asking a client, "What is this?"</p> <p>14 David would tell me, "This is from Swartz" or "This is</p> <p>11:50:44 15 from X company, this is from Y company," and we would</p> <p>16 have booked it exactly as they told us.</p> <p>17 Q Okay. Did you take any steps to verify the</p> <p>18 accuracy of what they told you?</p> <p>19 A No. That's not my job.</p> <p>11:50:56 20 Q That's not your practice?</p> <p>21 A That's not my job. I'm not required to do</p> <p>22 that. When we prepare the financial statement -- our</p> <p>23 preparation of the final statement is based on the</p> <p>24 representation of the clients. Not --</p> <p>11:51:09 25 Q Okay.</p>
Page 55	Page 57
<p>11:48:16 1 Q I understood your testimony before was that</p> <p>2 they were going to use K.Jam Media for, as you said,</p> <p>3 David's and Kia's business?</p> <p>4 A Kia had this business and David needed a</p> <p>11:48:30 5 vehicle to do his business. So therefore, they run it</p> <p>6 through K.Jam Media. I did not say that Kia and David.</p> <p>7 To this day, I don't believe that Kia and David were</p> <p>8 owner of the same entity at once or at least. I don't</p> <p>9 know.</p> <p>11:48:55 10 Q Okay. But they were involved in -- strike</p> <p>11 that.</p> <p>12 So what did you understand Mr. Bergstein's</p> <p>13 business was at that time in the 2011, 2012 time --</p> <p>14 A I had no idea what Mr. Bergstein --</p> <p>11:49:11 15 Q You got to -- you got to let me finish.</p> <p>16 A Sorry.</p> <p>17 Q What did you understand that Mr. Bergstein's</p> <p>18 business was in this 2011, 2012 time frame?</p> <p>19 A I don't have -- I did not have a good</p> <p>11:49:24 20 understanding of what he was doing then.</p> <p>21 Q Okay. So when did you start to see these</p> <p>22 millions of dollars coming in from Swartz IP?</p> <p>23 A I don't recall exactly. We have had financial</p> <p>24 statements that we have produced to government, to</p> <p>11:49:44 25 Mr. Wiechert's office, so all those transactions have</p>	<p>11:51:09 1 A I am not doing audit. If I were doing the</p> <p>2 audit, then I should have obtained additional</p> <p>3 verification of the facts.</p> <p>4 But as of -- at -- at the time that what we</p> <p>11:51:27 5 were doing was -- we call it bookkeeping or compilation,</p> <p>6 and under the compilation rules, everything is booked</p> <p>7 based on the representation of the management. And when</p> <p>8 we issue the financial statement, that report is on the</p> <p>9 top of that says, "All transactions are there based on</p> <p>11:51:45 10 the representation of the management and we formed no</p> <p>11 opinion about that."</p> <p>12 Q Okay. What about with respect to the entities</p> <p>13 for which you filed tax returns --</p> <p>14 A Uh-huh.</p> <p>11:51:57 15 Q -- do you take steps to verify the accuracy of</p> <p>16 client's representations in that regard?</p> <p>17 A Again, if we do have some reason to believe</p> <p>18 that the clients are not truthful or are not telling us</p> <p>19 the truth, first of all, we would not file tax return.</p> <p>11:52:17 20 And if I don't have any reason to believe that there is</p> <p>21 anything wrong, I would file the tax return based on</p> <p>22 their representation. And again, keep in mind that tax</p> <p>23 return is being signed by the taxpayer under the penalty</p> <p>24 of perjury, and I sign based on the information that the</p> <p>11:52:37 25 clients provide. I make sure this tax return prepared</p>

Page 58

11:52:41 1 according to the law.
 2 Q Okay. So you -- you testified -- testified
 3 before to seeing money, millions of dollars coming from
 4 Swartz IP?
 11:52:51 5 A I did not say million dollars from Swartz IP.
 6 I said I saw millions of dollars that are coming in and
 7 going. Some of them were from Swartz. I don't know
 8 whether millions or hundreds of thousand.
 9 Q And from what other entities were these monies
 11:53:09 10 coming from?
 11 A I don't know the name.
 12 Q Okay. Did you understand them to be entities
 13 with which Mr. Jam was affiliated?
 14 A No. None of them -- none of them were entities
 11:53:21 15 that's related to Mr. Jam.
 16 Q Okay. Were they entities with which
 17 Mr. Bergstein was affiliated?
 18 A I -- I think they were.
 19 Q Okay. Did you ever ask anyone why monies were
 11:53:42 20 coming in from Swartz IP at this time?
 21 A Yes. I recall in a meeting when -- when we
 22 wanted to file the K.Jam Media tax return, and we did
 23 not have answers to what was the sources of these funds
 24 coming in, I do recall that I called Kia and Kia came to
 11:54:06 25 our office from L.A. to Orange County and we spend the

Page 59

11:54:10 1 day and he told us that these monies are from these
 2 sources and this one is income, this was as a loan, this
 3 was a -- a liability. So we booked them according to
 4 what he told us.
 11:54:25 5 Q Okay. Do you have an understanding as you sit
 6 here today what type of business that Swartz IP was
 7 engaged in?
 8 A I have no knowledge of Swartz. I don't know
 9 what they do and -- not even today.
 11:54:40 10 Q Okay. Are you aware that Mr. Jam has
 11 identified himself as the vice president of Swartz IP?
 12 A Never know that. Never heard that.
 13 Q Okay. Do you understand that Mr. Jam had a
 14 role with respect to Swartz IP?
 11:54:55 15 A To this date, I had no knowledge of that.
 16 Q Are you aware of a transaction between Swartz
 17 IP and the plaintiff in this lawsuit, Wimbledon
 18 Class TT?
 19 A No, I do not.
 11:55:09 20 Q Okay. Are you familiar with an entity called
 21 Pineboard Holdings, Inc.?
 22 A I heard the name.
 23 Q Okay. What is Pineboard?
 24 A I have no idea.
 11:55:21 25 Q Okay. Do you understand that it's a company

Page 60

11:55:22 1 with which Mr. Jam was affiliated?
 2 A Yes, he was. And if I'm not mistaken, for a
 3 short period of time, we were even doing accounting for
 4 that entity, but we never prepare the tax return for
 11:55:40 5 Pineboard.
 6 Q Okay. Did you have a written and signed
 7 engagement agreement with Pineboard Holdings, Inc.?
 8 A I don't think that the relationship lasted that
 9 long. I mean, it came for a short period of time,
 11:55:57 10 again, when Kia was forming these entities, he would set
 11 up the bank account and he would add my name to the bank
 12 account so I knew I could have access to it, so I -- I
 13 would see what's going on. But I think Pineboard was
 14 a -- for a short period of time, we were doing it and
 11:56:18 15 then they took it over. In fact, they hired an in-house
 16 accountant. David hired an in-house accountant. A guy
 17 named -- I introduced him to them. I don't -- I don't
 18 remember his name.
 19 Q His first name Evan?
 11:56:41 20 A No. Evan -- Evan -- last name was Schwabsky,
 21 something like that. He was involved with Sovrin, Evan.
 22 Q You -- you testified before that they took it
 23 over referring to Pineboard Holdings.
 24 Who is "they"?
 11:56:56 25 A David.

Page 61

11:56:58 1 Q Okay. Are you referring to someone in addition
 2 to David?
 3 A David had the -- had his people behind him.
 4 David was not a one-man show.
 11:57:06 5 Q Right.
 6 Mr. Jam was one of those people?
 7 A No. Mr. Jam was not one of those people.
 8 David had his own accountants, CPAs, financial advisors,
 9 everything. So --
 11:57:23 10 Q Okay. Do you understand that Pineboard was
 11 involved -- strike that.
 12 What type of business was Pineboard involved in
 13 as you understood?
 14 A Nothing. I -- I never dealt with -- as I said,
 11:57:34 15 I -- my dealing with Pineboard was for a very short
 16 period of time, and I don't think that there were much
 17 transaction at the time that I -- I was involved with.
 18 Q Okay.
 19 A Again, if you show me a bank transaction that
 11:57:59 20 there were thousand of dollars are coming and going,
 21 just a fact that I don't remember at this second.
 22 Q Uh-huh.
 23 Okay. Let me show you what I'm marking as
 24 Exhibit 34.
 11:58:25 25 A 34? I see it.

Page 62		Page 64	
11:58:25	1 THE REPORTER: 35.	12:00:22	1 someone to sign on your behalf?
	2 MR. LATZER: Sorry. 35.		2 A I have no clue. This is very strange. I have
	3 (Exhibit 35 was marked for		3 never seen it. Because normally, I was the one who
	4 identification by the Court Reporter		4 would initiate opening the bank account because I had
11:58:27	5 and is attached hereto.)	12:00:34	5 the relationship with the Wells Fargo bank here. So we
	6 BY MR. LATZER:		6 would open the bank account just by mere -- a phone call
	7 Q Sir, I'm showing you a document that's		7 and they would send us these information, we would sign
	8 identified at the top as a business account application.		8 them and send them in and they would accept that. But
	9 A Uh-huh.		9 this signature, this is not my signature.
11:58:57	10 Q Do you see that?	12:00:56	10 Q Okay. Do you know if, in fact, you were a
	11 A That's correct.		11 signatory on the Pineboard Holdings account?
	12 Q And this is for Pineboard Holdings; is that		12 A I think I was for a period of time.
	13 correct?		13 Q Okay. As a signatory on the account, that
	14 A That's correct.		14 meant you had access to the account to authorize
11:59:03	15 Q Have you seen this document before?	12:01:22	15 transactions?
	16 A I don't recall this because as you see, my		16 A I had the access to the bank account, I had --
	17 signature is -- is not on it. I'm not the -- as I was		17 if we had checks, I could sign the checks. Yes, I did.
	18 saying, I did not see it. I see my name is on it, okay,		18 Q Okay. Let me direct you to page 3 of this
	19 but I don't recall signing or at least my signature is		19 document.
11:59:27	20 not on this.	12:01:35	20 A Uh-huh.
	21 Q Well, let me direct you --		21 Q On the top left, it says "Owner key individual,
	22 A Hold on.		22 one information."
	23 Q -- to the last page.		23 Do you see that?
	24 A Hold on. Hold on. No. No. Hold on.		24 A Uh-huh.
11:59:31	25 Here's my signature -- it says "Najmadin	12:01:43	25 Q And the customer name is identified as Mr. Jam?
Page 63		Page 65	
11:59:33	1 Zarrinkelk" but that's not my signature. That's not my	12:01:47	1 A That's correct.
	2 signature.		2 Q And underneath that, it says "manager"?
	3 Q Okay.		3 A Uh-huh.
	4 A Here --		4 Q Okay. Did you understand that Mr. Jam was the
11:59:39	5 Q Are you looking at page 4 of 4 of the document?	12:01:53	5 manager for Pineboard Holdings, Inc.?
	6 A Yes.		6 A It could have been. That's correct.
	7 Q Okay.		7 Q Okay. Do you understand that Mr. Jam
	8 A I'm looking at the page 4 of the document. It		8 established Pineboard Holdings, Inc.?
	9 has my name but that's not my signature.		9 A Most probably.
11:59:51	10 Q Okay. Is it your testimony that someone signed	12:02:09	10 Q Okay.
	11 this document on your behalf?		11 A Mr. Jam is very good in terms of opening a
	12 A I'm saying this is not my signature.		12 company and opening the bank account for whatever
	13 Q Okay. So you didn't, in fact, sign this		13 reason. He just simply does that without -- sometimes
	14 document?		14 he does it before even discuss it with me.
12:00:02	15 A I did not sign this document.	12:02:27	15 Q Okay. Now, if you could turn to page 2 of this
	16 Q Did you authorize someone to sign on your		16 document where it says "business information."
	17 behalf?		17 A Uh-huh.
	18 A I never authorized anybody to sign anything on		18 Q About halfway down the page, it says, "Date
	19 my behalf.		19 originally established."
12:00:11	20 Q You've never done that ever?	12:02:39	20 Do you see that? Says "September 8, 2011."
	21 A Ever.		21 I'm looking on the left-hand side.
	22 Q Okay. You never authorized Mr. Jam to sign on		22 A Okay. The filing date, September 8, 2011. I'm
	23 your behalf?		23 looking at the bank who's on the -- where -- where do
	24 A No.		24 you see?
12:00:19	25 Q Okay. Do you know what might have prompted	12:02:55	25 Q Are you on page 2 of the document?

Page 66		Page 68	
12:02:57	1 A I am on the -- oh, yes. Date originally	12:05:01	1 and such with a group of friends. Can you open the bank
	2 established, yes.		2 account?"
	3 Q Yeah.		3 I'd say, "Sure."
	4 A September of 2011.		4 He calls one of these online companies that set
12:03:03	5 Q Okay. Do you recall Pineboard Holdings Inc.	12:05:18	5 up the corporation. Parasec is one of them. And then
	6 being established at that time?		6 they form the entity. They send the power -- the
	7 A If here it says, it must have.		7 article of incorporation and then we would apply for the
	8 Q Okay. And to the right, the street address for		8 federal ID number then I would forward it to the bank
	9 Pineboard Holdings, Inc. is identified as 34 Executive		9 then bank would open the bank account. This is -- this
12:03:18	10 Park, Suite 210?	12:05:37	10 is what you used to be. Not anymore. These days, banks
	11 A That's not -- my address.		11 don't do that.
	12 Q That's your address.		12 Q Okay. So do you recall that procedure
	13 A That's -- that's the address on this card.		13 happening with respect to Pineboard?
	14 Q Okay.		14 A Must have.
12:03:24	15 A As I said, normally, I would open these bank --	12:05:48	15 Q Do you recall that procedure happening with
	16 bank accounts for -- for him. He would ask me to open		16 respect to Pineboard Inc. -- Holdings, Inc.?
	17 it. He would send me a copy of the article of		17 A Must have.
	18 incorporation. We would get the federal ID number. We		18 Q Okay. And do you recall a discussion with
	19 would send it to the bank. That bank would send this to		19 Mr. Jam as to why he was establishing this Pineboard
12:03:41	20 us. We would sign it and send it back and the bank	12:06:02	20 Holdings company?
	21 account is -- and if you look at the line below that		21 A We must have, but I don't recall what was the
	22 original date, you see that, it says "annual gross		22 purpose of that. Here I see, it says, "Industry,
	23 income" of a thousand dollars?		23 professional, scientific, technical service." I have no
	24 Q Uh-huh.		24 clue as to what it means.
12:03:54	25 A That tells you how big a company it was or was	12:06:17	25 Q Okay. Let me show you what's marked as
Page 67		Page 69	
12:03:57	1 supposed to be at the time.	12:06:51	1 Exhibit 36.
	2 Q Do you recall -- the process that you just		2 (Exhibit 36 was marked for
	3 described before with the articles of incorporation		3 identification by the Court Reporter
	4 being sent to you, did that happen with respect to		4 and is attached hereto.)
12:04:09	5 Pineboard Holdings, Inc.?	12:06:53	5 BY MR. LATZER:
	6 A Must have. Otherwise, the bank would not have		6 Q I believe you testified earlier as to your
	7 opened the bank.		7 familiarity with an entity called Integrated
	8 Q Okay. Now, if you look at the first page of		8 Administration?
	9 this document, there are two account numbers listed.		9 A That's correct.
12:04:19	10 One ending in 9106.	12:07:17	10 Q Okay. And this is one of Mr. Jam's entities;
	11 Do you see that?		11 is that correct?
	12 A Uh-huh.		12 A That is correct.
	13 Q And the other ending in 2536?		13 Q Okay.
	14 A Uh-huh.		14 A It was a subsidiary of K.Jam Media at the time.
12:04:25	15 Q Okay. So do you understand that you were the	12:07:28	15 Q And what was Mr. Jam's relationship to K.Jam
	16 authorized signatory for both of those accounts?		16 Media?
	17 A If my name was on that, I would have access to		17 A Mr. Jam was the 100 percent owner of K.Jam
	18 both, and I had the authority to transact on both.		18 Media.
	19 Q Okay. Do you recall a discussion with Mr. Jam		19 Q Okay. And K.Jam meaning it was the 100 percent
12:04:43	20 at any point regarding Pineboard Holdings, Inc.?	12:07:40	20 owner of Integrated Administration?
	21 A Again, this is -- this is how it happens. Kia		21 A It was decided later on to be that way.
	22 calls me and says, "Majid, I want to open my company,		22 Q Okay. Do you understand what the ownership
	23 Pineboard."		23 structure was as of the 2011 and 2013 time frame?
	24 And I say, "What is this for?"		24 A As I said, at the time that we opened it, it
12:04:57	25 He says, "Oh, I'm getting into business of such	12:07:58	25 was not clear, but later on, it was decided that

Page 70			Page 72		
12:08:03	1	Integrated Ad- -- Administration to be owned by K.Jam	12:10:36	1	Q Okay.
	2	Media. So it became a subsidiary of it.		2	A As part of K.Jam Media.
	3	Q Okay. When -- approximately when was that		3	Q Okay. What do you mean "as part of K.Jam
	4	decided?		4	Media"?
12:08:14	5	A I can't tell you exact date but must have been	12:10:42	5	A Because this was a subsidiary of K.Jam Media,
	6	within a period of time.		6	so we did not file a separate tax return for Integrated
	7	Q Okay. And what type of business was Integrated		7	Administration.
	8	Administration --		8	Q Okay. But the tax return for K.Jam Media would
	9	A Integrated Administration --		9	refer to Integrated Administration?
12:08:24	10	Q Let -- let me finish.	12:10:58	10	A That's correct. That's correct.
	11	What type of business was Integrated		11	Q Your testimony is that you had no obligation to
	12	Administration in?		12	file a tax return separately for Integrated
	13	A Integrated Administration was a payroll		13	Administration?
	14	company.		14	A That is correct. Because it was a subsidiary
12:08:36	15	Q Okay. What did that entail?	12:11:09	15	so we would consolidate the financial statement of K.Jam
	16	A It was running payroll for the David Bergstein		16	Media which was not only this. There was a couple of
	17	entities, different entities.		17	other entities in there, okay, and then we would file a
	18	Q Did it run payroll for any entities other than		18	consolidated return.
	19	David Bergstein entities?		19	Q Do you recall whether you did that for 2011?
12:08:58	20	A I don't recall.	12:11:31	20	A Do I recall?
	21	Q Did it run payroll for Mr. Jam's entities?		21	Q Uh-huh.
	22	A No. Mr. Jam had his own pay- -- payroll.		22	A Yes.
	23	Q Okay. And how specifically did it run payroll		23	Q And did you do it for 2012?
	24	for David Bergstein's entities?		24	A Yes, I did.
12:09:16	25	A David would send us a list of the employees and	12:11:36	25	Q 2013?
Page 71			Page 73		
12:09:19	1	David would say, "This is for Sovrin. This is for" --	12:11:38	1	A Yes, sir.
	2	there were two or three entities, okay, and then we		2	Q '14?
	3	would run them then we would allocate their cost and we		3	A Certainly.
	4	would send it to their accountant. They would record it		4	Q Okay. Okay. Let's look at the Exhibit 36 that
12:09:38	5	accordingly.	12:12:05	5	I placed in front of you before.
	6	Q Do you recall when Integrated Administration		6	This is another business account application;
	7	was established?		7	is that correct?
	8	A I think it was in 2011, and here, I see it's		8	A This is what?
	9	August of 2011 which seems to be correct.		9	Q A business account application?
12:10:01	10	Q Okay. And do you recall a discussion with --	12:12:14	10	A Uh-huh.
	11	with Mr. Jam regarding the establishment of Integrated		11	Q And this is with respect to Integrated
	12	Administration?		12	Administration?
	13	A Nothing in specific. As I said, this is the --		13	A Uh-huh.
	14	this was very routine. He would call me and say,		14	Q Okay. Can you turn to the last page?
12:10:15	15	"Majid, open up this bank account for me and here is the	12:12:21	15	A Uh-huh.
	16	article of incorporation." And I would do that.		16	Q There is a spot on the last page for your
	17	Q Okay. What was your relationship with		17	signature but --
	18	Integrated Administration?		18	A Uh-huh.
	19	A Again, same as the other entities, accountant.		19	Q -- it's blank.
12:10:30	20	Q I'm sorry. Same --	12:12:28	20	Do you agree with that?
	21	A Accountant.		21	A Do I agree with that?
	22	Q Accounting services?		22	Q Yeah, that the spot is blank.
	23	A That's correct.		23	A I don't know when this copy was made.
	24	Q Okay. You file tax returns?		24	Q But the one -- the copy that is in front of
12:10:36	25	A That is correct.	12:12:39	25	you, it's not signed by you?

Page 74	Page 76
<p>12:12:42 1 A That is correct.</p> <p>2 Q Okay. Do you recall ever signing this business</p> <p>3 account application?</p> <p>4 A If I did not sign it, I -- I would not have</p> <p>12:12:48 5 access to -- to it. And I think the way that this would</p> <p>6 have worked is they would send it to me. I would</p> <p>7 forward it to Kia. Kia would sign it and then send it</p> <p>8 back to me. I would add my signature to it and I would</p> <p>9 forward it to the bank.</p> <p>12:13:05 10 Q Okay. So you did, in fact, have access to</p> <p>11 Integrated Administration bank account?</p> <p>12 A That's correct. That's correct.</p> <p>13 Q Okay. So even though this is unsigned, you</p> <p>14 believe that you did sign an account application at some</p> <p>12:13:17 15 point?</p> <p>16 A That is correct.</p> <p>17 Q Okay. And that's with respect to the account</p> <p>18 ending in 1578?</p> <p>19 A I don't know the exact account number, but if</p> <p>12:13:26 20 that's the account number for Integrated, yes.</p> <p>21 Q Okay. If you could take a look at the first</p> <p>22 page. There is an account number.</p> <p>23 A Yeah. I -- I see that.</p> <p>24 Q Okay. Are you aware of any other bank accounts</p> <p>12:13:38 25 other than the one ending in 1578 for Integrated</p>	<p>12:50:54 1 identification by the Court Reporter</p> <p>2 and is attached hereto.)</p> <p>3 BY MR. LATZER:</p> <p>4 Q This is an Advantage Business Package Checking</p> <p>12:51:06 5 statement for Pineboard Holdings, Inc.?</p> <p>6 A Uh-huh.</p> <p>7 Q Do you recall seeing this document before?</p> <p>8 A Yes. I know this document because my -- some</p> <p>9 of the entries in there was made by me.</p> <p>12:51:27 10 Q Okay. So this is a statement for Pineboard's</p> <p>11 bank account and specifically the account ending 9106;</p> <p>12 is that correct?</p> <p>13 A That is correct.</p> <p>14 Q Okay. And that's one of the accounts for which</p> <p>12:51:37 15 you were an authorized signatory; is that correct?</p> <p>16 A That is correct.</p> <p>17 Q Okay. Let's look at page 2 of the statement</p> <p>18 and specifically on April 18 of 2012, there was a</p> <p>19 deposit into the account of \$2,035,031.61.</p> <p>12:51:57 20 Do you see that?</p> <p>21 A That is correct.</p> <p>22 Q And that deposit was from Physicians Management</p> <p>23 Practice.</p> <p>24 Do you see that?</p> <p>12:52:12 25 A That's correct.</p>
Page 75	Page 77
<p>12:13:41 1 Administration?</p> <p>2 A I don't recall.</p> <p>3 MR. LATZER: Would you guys be okay with</p> <p>4 breaking for lunch? I'm at a good stopping point so</p> <p>12:14:22 5 let's do that.</p> <p>6 THE VIDEOGRAPHER: The time is 12:14 p.m. We</p> <p>7 are now off the record.</p> <p>8 (A lunch recess was taken.)</p> <p>9 THE VIDEOGRAPHER: We are back on the record.</p> <p>12:50:05 10 The time is 12:49 p.m.</p> <p>11 BY MR. LATZER:</p> <p>12 Q Sir, before we broke for lunch, we were</p> <p>13 discussing certain monies that were coming in from</p> <p>14 Swartz IP.</p> <p>12:50:19 15 Do you recall that?</p> <p>16 A I've seen money coming from Swartz IP.</p> <p>17 Q Okay. I -- I believe your testimony was that</p> <p>18 money was coming to Swartz IP or from Swartz IP to</p> <p>19 Integrated Administration; is that correct?</p> <p>12:50:35 20 A To one of the entities, I can't right now say</p> <p>21 seven years ago, whether it came to IA or K.Jam Media</p> <p>22 but it came to one of these entities, yes.</p> <p>23 Q Okay. Let me show you what's been marked as</p> <p>24 Exhibit 37.</p> <p>12:50:54 25 (Exhibit 37 was marked for</p>	<p>12:52:13 1 Q Okay. What is Physicians Management?</p> <p>2 A I have no idea.</p> <p>3 Q Okay. Do you have any idea why Pineboard was</p> <p>4 receiving these monies at this time?</p> <p>12:52:25 5 A No.</p> <p>6 Q Okay. Did you have any discussion with Mr. Jam</p> <p>7 regarding why Pineboard was receiving monies at this</p> <p>8 time?</p> <p>9 A No, because I was not handling Pineboard, so it</p> <p>12:52:38 10 was not my responsibility.</p> <p>11 Q You weren't handling Pineboard but you were an</p> <p>12 authorized signatory --</p> <p>13 A That is correct.</p> <p>14 Q Okay. Who was handling Pineboard?</p> <p>12:52:49 15 A David and Kia.</p> <p>16 Q David and Kia work together handling Pineboard?</p> <p>17 A I suppose, because the instruction was coming</p> <p>18 from them.</p> <p>19 Q They were both providing you instruction?</p> <p>12:53:01 20 A Uh-huh.</p> <p>21 Q With respect to these transfers of money?</p> <p>22 A That is true.</p> <p>23 Q Okay. Do you recall receiving instruction from</p> <p>24 David or Kia with respect to this money that came from</p> <p>12:53:11 25 Physicians Management?</p>

Page 78

12:53:11 1 A Uh-huh.
 2 Q You do recall?
 3 A I don't recall what was that for. No, I don't.
 4 Q Okay. But do you recall -- after the money
 12:53:18 5 or -- at or around the time the money came in from
 6 Physicians Management, do you recall any instruction
 7 from Mr. Jam or Mr. Bergstein with respect to the
 8 disbursement of those monies?
 9 A That is correct. I receive the instruction to
 12:53:31 10 disburse that and those are -- those four, five
 11 disbursements -- I made that because those are my --
 12 my -- what do you call it -- my signature description.
 13 Q Okay. So you received those instructions from
 14 both Mr. Jam and Mr. Bergstein?
 12:53:54 15 A Either Mr. Jam or Mr. Bergstein.
 16 Q They were operating in tandem as far as you are
 17 concerned?
 18 A That is correct.
 19 Q Okay. Now, let's focus on the transfer on 4/19
 12:54:10 20 and it's an entry of \$450,000 from Pineboard to IA.
 21 Do you see that?
 22 A Uh-huh. That's correct.
 23 Q Okay. So IA is referring to Integrated
 24 Administration?
 12:54:19 25 A That's correct.

Page 79

12:54:20 1 Q Okay. And this is a transfer that was
 2 authorized by Mr. Jam or Mr. Bergstein or both of them?
 3 A That's correct.
 4 Q Okay. And do you have an understanding as to
 12:54:29 5 why Pineboard was transferring \$450,000 to Integrated
 6 Administration?
 7 A No. At that point of time, these monies were
 8 flying from one account to the other account without
 9 telling us what happened. As you see, that the money
 12:54:46 10 came on the 4/18 and then by 4/19, it's gone.
 11 Q It's all gone?
 12 A All gone.
 13 So they were just running it through these
 14 entities and we had no clue and, again, this was not my
 12:55:00 15 client so it was not my responsibility but I had access
 16 and -- and I was the facilitator in terms of just the
 17 banking side of it.
 18 Q Okay. So Mr. Bergstein and Mr. Jam were
 19 running monies through this account rapidly at this
 12:55:18 20 period of time?
 21 A Again, I'm talking about these four, five as an
 22 example.
 23 Q Okay. All right. So let's look at the two
 24 transactions on 4/19, the last --
 12:55:34 25 A Uh-huh.

Page 80

12:55:34 1 Q -- and the first of those two says, "Business
 2 checking from Pineboard to ZKCO for wire to Swartz."
 3 Do you see that?
 4 A Not to Swartz. To Gen Health. The second one
 12:55:51 5 is -- the second 500,000 after the 450, this is -- this
 6 is exactly my signature description, "From Pineboard to
 7 ZKCO wire to Gen Health." And then next one says, "From
 8 Pineboard to ZKCO wires to Don Carroll." Then another
 9 one, it says, "From Pineboard to ZKCO for wire to
 12:56:14 10 Swartz" and then "From Pineboard to Swartz" again. Let
 11 me tell you what is ZKCO wire means.
 12 At that point of time, I had the wire -- I was
 13 able to wire funds from ZKCO account. Okay. They did
 14 not have that. So therefore, in order to expedite the
 12:56:43 15 transfer of funds, they would call me and say, "Majid,
 16 can you please wire this \$500,000 to such and such
 17 person?" And I would transfer that to our wire account
 18 to ZKCO wire account. And then from there, I was -- I
 19 had the ability of wiring it to third party. And my
 12:57:04 20 description clearly says where the money is coming from,
 21 where is it going to, and what is the purpose. Okay.
 22 In the -- I had this much room to describe or put the
 23 description. So this is my signature description.
 24 From, to, for what.
 12:57:29 25 Q Okay. So you -- I think you described yourself

Page 81

12:57:33 1 as -- where you were the facilitator for these
 2 transactions?
 3 A That is correct.
 4 Q Okay. Now, let's focus on the first of the
 12:57:44 5 four that you just described, the \$500,000 payment from
 6 Pineboard ultimately to General Health.
 7 Do you see that?
 8 A That's correct.
 9 Q Okay. Now, what was your understanding as to
 12:57:58 10 the purpose of that payment?
 11 A I had no understanding and I did not know and I
 12 did not care at that -- at -- at the time. Again, I was
 13 just simply being a help to Mr. Jam and he asked me,
 14 "Can you make this transfer?" And I did that.
 12:58:20 15 Q Okay. Is that true for the remaining three
 16 transactions --
 17 A All of that. All three. All four of them.
 18 Five of them.
 19 Q Okay. Now, did you have an understanding why
 12:58:29 20 these monies couldn't come directly from the originating
 21 source, Pineboard?
 22 A No, I had no -- again, this is not my client.
 23 I did not know anything. The only involvement that I
 24 had was because of the fact that I was on this account,
 12:58:46 25 I had this signatory, and then I had the ability of

Page 82		Page 84	
12:58:51	1 wiring funds from my account. So I would transfer it	13:01:29	1 fee in exchange for facilitate- -- facilitating these
	2 from Pineboard to ZKCO wire and then wire it.		2 sort of transfers?
	3 Then when -- when I saw that these number of		3 A No. I was just charging my hourly rate. If it
	4 wires was increasing, so what we did was we set up a		4 took me half an hour, I would charge him half an hour.
12:59:05	5 wire account for K.Jam Media so they didn't have to hit	13:01:41	5 If it take -- took me 15 minutes, I would charge them
	6 ZKCO account. So we set up one account -- one wire		6 15 minutes.
	7 account for K.Jam Media. In the following year, you		7 Q Okay. And you never had a discussion with
	8 would see that the money goes directly if it's coming		8 either Mr. Bergstein or Mr. Jam with respect to the
	9 from here, goes to K.Jam Media wire account, and then		9 purpose or the nature of these transactions that we've
12:59:30	10 from that wire account to whatever they were -- they	13:02:07	10 been discussing on this statement?
	11 were going.		11 A As long as they did not hit the accounts that
	12 Q Okay. So K.Jam Media became the facilitator?		12 we were handling it, like K.Jam Media, it was irrelevant
	13 A That is correct.		13 to me.
	14 Q They took over for you?		14 Q Okay. I guess I'm a little confused, though,
12:59:39	15 A I'm sorry, what?	13:02:21	15 because you're the signatory on this account --
	16 Q They took over for you as the facilitator?		16 A That is true.
	17 A The account?		17 Q -- but you're telling me that you weren't
	18 Q Right.		18 handling this account?
	19 A Okay. I didn't -- when I saw that these		19 A That's correct.
12:59:44	20 transactions was so many and so large, I didn't want to	13:02:27	20 Q And your testimony is that Mr. Bergstein was
	21 have anything to do with that. So we set up the account		21 handling this account?
	22 for K.Jam Media so we could do it through there.		22 A This is -- this is their money, they were
	23 Although I was doing it at the same time -- at -- at		23 handling it. I was just a facilitator because I had the
	24 that time, too. Again, I was the person who was		24 access and I had this relationship with Wells Fargo that
13:00:03	25 initiating the wires.	13:02:42	25 if I wanted to open a bank account, I could open it from
Page 83		Page 85	
13:00:05	1 Q Okay. Why didn't you want anything to do with	13:02:45	1 my office instead of going to the branch and setting up
	2 it?		2 the account so --
	3 A Again, the first time was one or two		3 Q This was Mr. Bergstein and Mr. Jam's money,
	4 transaction then I saw that there were too many, I had		4 though?
13:00:17	5 no reason to mingle them with my accounting practice.	13:02:54	5 A That is correct. That was entirely there. It
	6 So I asked them to set up a -- their own account, so I		6 never hit the accounts that we were handling, so I
	7 facilitated that. We set up -- setting up the wire		7 didn't concern myself with it.
	8 account with Wells Fargo is not an easy task. So you		8 Q Let me show you what I'm marking as Exhibit 38.
	9 have to go through so many steps in order to get it		9 A 38.
13:00:35	10 done, so that's what we did.	13:03:17	10 (Exhibit 38 was marked for
	11 Q Okay. Did you consider it problematic to your		11 identification by the Court Reporter
	12 accounting practice that you were serving as the		12 and is attached hereto.)
	13 facilitator?		13 BY MR. LATZER:
	14 A I wasn't -- I wasn't -- again, this was not		14 Q This, sir, is a bank -- a bank statement for
13:00:44	15 money that I was managing it. I had no reason to be	13:03:39	15 Swartz IP Services Group, Inc. for the account number
	16 dealing with them, so that's what we did.		16 ending in 9114 and at the time period of April 1st, 2012
	17 Q Okay. When did you see that these transfers		17 to April 30th, 2012.
	18 were increasing in volume?		18 Do you see that?
	19 A I think they were more or less in 2012 and '13,		19 A That's correct.
13:01:07	20 most of them, I think. Again, this is five, six years	13:03:52	20 Q Okay. Have you seen this bank statement
	21 ago. You have all -- a -- I don't know whether you		21 before?
	22 have all of the accounting records that we provided to		22 A No. Never.
	23 Mr. Wiechert and also to the government. If you have,		23 Q Let's turn to page 2, if you can?
	24 you can clearly see all these transactions.		24 A I am.
13:01:26	25 Q Okay. And so did you or your firm receive a	13:04:02	25 Q Okay. Now, we see a transaction on 4/19, it's

Page 86

13:04:09 1 the first one on here.
 2 A Uh-huh.
 3 Q Now, do you agree with me that this refers to
 4 the monies that we just looked at on the Pineboard
 13:04:18 5 account?
 6 A No. I'm not sure. Let me see. Yes, this
 7 should be the combination of those two \$500,000. And as
 8 you see, the initiator is Zarrinkelk Kashefipour.
 9 That's the name of our firm because the wire account was
 13:04:43 10 under our name.
 11 Q Right.
 12 So there is no reference here to the actual
 13 originating source which was Pineboard?
 14 A No, it's not, because the bank would only see
 13:04:55 15 who is the sender. And the sender was ZKCO wire
 16 account.
 17 Q Okay. So this 4/19 transaction is a million
 18 dollars that was deposited into Swartz IP account; is
 19 that correct?
 13:05:18 20 A That's correct.
 21 Q And you on behalf of Pineboard made two
 22 separate \$500,000 transfers?
 23 A Yes.
 24 Q You facilitated those transfers?
 13:05:28 25 A That is correct.

Page 87

13:05:29 1 Q Okay. And they were deposited into the account
 2 as one, \$1 million transfer?
 3 A That's -- that's very surprising because
 4 normally, banks don't do it like that. They normally
 13:05:39 5 show one transaction at a time so whether this represent
 6 those two 500,000 or something different, I don't know.
 7 Q And did you have an understanding that Mr. Jam
 8 and Mr. Bergstein did not want the recipient of this
 9 \$1 million to know that the actual transferor of the
 13:06:02 10 funds was Pineboard?
 11 A It never crossed my mind. This is the first
 12 time that you're bringing it up.
 13 Q Okay. Did you talk about that at all with the
 14 government when you met with them in the winter or fall
 13:06:12 15 of 2017?
 16 A If they asked me, I -- I answered them the same
 17 way.
 18 Q Okay. You were truthful in all your responses
 19 to the government?
 13:06:21 20 A I think I was.
 21 Q Okay. And I believe this would be consistent
 22 with your testimony before. You, as you sit here today,
 23 don't have an understanding as to the purpose of this
 24 \$1 million payment from Pineboard through your account
 13:06:46 25 to Swartz IP?

Page 88

13:06:47 1 A That is correct.
 2 Q Let's look at the transaction on 4/20.
 3 A Uh-huh.
 4 Q The second to the last one on the page. It's
 13:07:00 5 a -- a withdrawal of \$1 million.
 6 Do you see that?
 7 A Uh-huh.
 8 Q Okay. And the recipient of the \$1 million is
 9 Societe -- Societe Generale.
 13:07:10 10 Do you see that?
 11 A That's correct.
 12 Q Okay. Do you have any understanding as to why
 13 the monies were transferred on 4/20 to Societe Generale?
 14 A No.
 13:07:26 15 Q No.
 16 Okay. I'm going to show you what's been marked
 17 as Exhibit 39.
 18 (Exhibit 39 was marked for
 19 identification by the Court Reporter
 13:07:44 20 and is attached hereto.)
 21 BY MR. LATZER:
 22 Q And this is a bank statement for Swartz IP
 23 Services Group for the account ending in 9114 and for
 24 the time period of December 1st, 2013 through
 13:08:12 25 December 31st, 2013.

Page 89

13:08:14 1 Do you see that?
 2 A That's correct.
 3 Q Okay. Have you seen this document before?
 4 A Never.
 13:08:21 5 Q Okay. Let's look at the first transaction on
 6 page 2.
 7 Do you see that?
 8 A Yes.
 9 Q So this is a December 6th transaction and it
 13:08:38 10 appears to show that \$50,000 was transferred from your
 11 firm by order of K.Jam Media to Swartz IP; is that
 12 correct?
 13 A I think this is the time that we set up the
 14 K.Jam Media wire account. As you see, it says "K.Jam
 13:09:01 15 Media," but the originator had my name on it because I
 16 was originating it. But this must have come -- I -- I
 17 think -- I'm not 100 percent sure -- I think this wire
 18 was sent from K.Jam Media wire account that I was
 19 previously saying that we established.
 13:09:21 20 Q Okay. So at this point in time, were you still
 21 serving as the facilitator for these sorts of
 22 transactions?
 23 A Yes.
 24 Q Okay. And do you recall --
 13:09:30 25 A Again, this is a -- just about a couple of

Page 90	Page 92
<p>13:09:33 1 months later than that.</p> <p>2 Q Okay. And do you recall who specifically</p> <p>3 authorized this transaction?</p> <p>4 A No. At this time, no.</p> <p>13:09:44 5 Q Okay. It would have been another transaction</p> <p>6 pertaining to Mr. Bergstein and Mr. Jam?</p> <p>7 A That is correct. Let me tell you one</p> <p>8 additional statement, if I may.</p> <p>9 During this -- I was subpoenaed by SEC first to</p> <p>13:10:07 10 produce document. And during that process, we produced</p> <p>11 pretty much everything from 2000 -- I think it was 2010</p> <p>12 or '11 all the way to 2017. Financial statement, bank</p> <p>13 statement, credit card statement, tax return, and then</p> <p>14 in that interview, again, I was subpoenaed to appear for</p> <p>13:10:36 15 that interview which I was supposed to go before the</p> <p>16 grand jury, but they decided my testimony was sufficient</p> <p>17 so they didn't take me there. They asked me all these</p> <p>18 questions. They had all those financial statement,</p> <p>19 financial information.</p> <p>13:10:52 20 So here me sitting here, I -- I can't recall on</p> <p>21 December 6 of 2013 what I did or what I received. We</p> <p>22 gave them every single e-mail that we had. We gave them</p> <p>23 every copy of every document even if it was a posted</p> <p>24 note. The attorneys -- my attorneys came in our office</p> <p>13:11:18 25 and they made a copy of everything and they made a copy</p>	<p>13:12:42 1 Q Okay. Well --</p> <p>2 A But the ones that's going out of their account,</p> <p>3 was out of my control.</p> <p>4 Q I understand.</p> <p>13:12:46 5 I'm just asking you that aside whether you have</p> <p>6 any knowledge of what Broadway --</p> <p>7 A No, I don't.</p> <p>8 Q Let me finish.</p> <p>9 That aside whether you have any knowledge of</p> <p>13:12:55 10 what Broadway 4D Theaters is?</p> <p>11 A No, I don't.</p> <p>12 Q Okay. Do you know whether Mr. Jam is</p> <p>13 affiliated with that entity?</p> <p>14 A Broadway 4 -- 4D, no.</p> <p>13:13:08 15 Q Do you know if Mr. Bergstein is affiliated with</p> <p>16 that entity?</p> <p>17 A I never heard of that entity before.</p> <p>18 Q Okay. Do you agree with me that this statement</p> <p>19 shows that three days after Swartz IP received \$50,000</p> <p>13:13:31 20 from K.Jam Media that \$41,672 was transferred to</p> <p>21 Broadway 4D Theaters?</p> <p>22 A What is the importance of my agreement with</p> <p>23 this statement of yours?</p> <p>24 Q I'm just asking the question.</p> <p>13:13:45 25 A Again, I'm -- what is the importance? This is</p>
Page 91	Page 93
<p>13:11:23 1 of all our billing for that period of time. They --</p> <p>2 they brought a couple of IT experts in order to</p> <p>3 extract -- even my telephone text, they -- we -- we</p> <p>4 provided it. There was nothing. Nothing. Even one</p> <p>13:11:44 5 piece of document from -- for this period of time that</p> <p>6 we did not provide to the government.</p> <p>7 Q Okay. Understood.</p> <p>8 Let's look a little further down on page 2 of</p> <p>9 this exhibit, the 12/9 transaction refers to Broadway 4D</p> <p>13:12:05 10 Theaters.</p> <p>11 Do you see that?</p> <p>12 A I do.</p> <p>13 Q Do you have an understanding as to what</p> <p>14 Broadway 4D Theaters is?</p> <p>13:12:13 15 A Again, if I may, any statement of Swartz, if</p> <p>16 you show me, I would not have any knowledge of any of</p> <p>17 them because I never dealt with them. I don't know</p> <p>18 them. I -- so therefore, you can -- you can give me 500</p> <p>19 of these and ask me the same question and my answer</p> <p>13:12:31 20 would be no.</p> <p>21 Q Okay. Well, you did deal with them in the</p> <p>22 sense that you were facilitating transact- -- transfers</p> <p>23 of monies to them.</p> <p>24 A When I was sending money in there, in some</p> <p>13:12:40 25 instances, yes, I was.</p>	<p>13:13:47 1 the account that I -- it's as if you are bringing me</p> <p>2 your personal bank statement and asking me do I know</p> <p>3 anything about the transfers made from your account.</p> <p>4 Why -- why would I -- why would I need to</p> <p>13:13:58 5 confirm or disconfirm that?</p> <p>6 Q Because I'm asking you.</p> <p>7 So do you agree or do you disagree?</p> <p>8 A I have no clue. I -- this is not the account.</p> <p>9 This is the account of a third party. And you're asking</p> <p>13:14:10 10 me about the transfer they made, so how would I know?</p> <p>11 Q Okay. Are you aware that Integrated</p> <p>12 Administration during the 2011 to 2013 time period</p> <p>13 received approximately \$2 million from Swartz IP?</p> <p>14 A It could very well be.</p> <p>13:14:37 15 Q Okay. Okay. I'm going to show you what I'm</p> <p>16 marking as Exhibit 40.</p> <p>17 (Exhibit 40 was marked for</p> <p>18 identification by the Court Reporter</p> <p>19 and is attached hereto.)</p> <p>13:15:03 20 BY MR. LATZER:</p> <p>21 Q And, sir, these I'll re- -- represent to you</p> <p>22 are bank statements for Integrated Administration. The</p> <p>23 first one is dated August 11th, 2011 through</p> <p>24 August 24th, 2011, and the last one in the packet is</p> <p>13:15:32 25 March 1st, 2014 to March 31st, 2014.</p>

Page 94		Page 96	
13:15:37	1 A My first one is from December 6, 2011 to	13:19:11	1 Q Do you have an understanding as to the purpose
	2 December 31, 2011.		2 of this payment?
	3 Q Okay. Can you hand it back to me, please? I		3 A No.
	4 may have given you the wrong one.		4 Q Okay. Did you ever have a discussion with
13:15:49	5 A Sure.	13:19:17	5 Mr. Jam regarding the purpose of this payment?
	6 Maybe just the first few pages is not in order.		6 A I think, as I said before, in a meeting that we
	7 That's --		7 had a year or two later, because we were unable to file
	8 Q Okay. Thanks for pointing that out. Let's try		8 these tax returns on time so I needed to know what these
	9 that again.		9 payments were for. So Kia came to my office and said
13:16:59	10 A Sure. Sure.	13:19:38	10 this is loan, this is this, this is income, so we acted
	11 Q So can you -- what you have now in front of you		11 upon that.
	12 is what I described before, which is bank account		12 Q And you said that happened approximately a year
	13 statements for Integrated Administration. The first		13 or two later?
	14 statement should be August 11th, 2011 through		14 A I believe because we filed 2011 and 2012 tax
13:17:10	15 August 24th, 2011. And the last statement in the packet	13:19:53	15 returns about a -- about two years later than their due
	16 would be March 1st, 2014 through March 31st, 2014.		16 date.
	17 A It seems like it.		17 Q You filed that, I believe you testified before,
	18 Q Okay. So I'm going to direct you to a		18 as part of K.Jam Media's --
	19 particular transaction within this packet.		19 A That is correct.
13:17:26	20 A Sure.	13:20:09	20 Q -- return?
	21 Q And you'll see on the top right-hand corner, it		21 A That is correct.
	22 says, on the first page, page 2 of 127.		22 Q You didn't file a separate return for
	23 A Uh-huh.		23 Integrated Administration?
	24 Q So I'll refer to you -- refer to those page		24 A That is correct. It is part of that
13:17:36	25 numbers when I direct you to the particular transaction.	13:20:15	25 consolidated return.
Page 95		Page 97	
13:17:39	1 A Yes, please.	13:20:17	1 Q Okay. And you understood that you had no
	2 Q Okay. Now, just taking a step back, am I		2 obligation to file a separate return for Integrated
	3 correct that you were the signatory or one of the		3 Administration?
	4 signatories for this 1578 account?		4 A That is correct. Integrated Administration was
13:17:49	5 A Yes, I was.	13:20:24	5 a 100 percent owned subsidiary of K.Jam Media.
	6 Q And Integrated Administration was one of		6 Q Okay. So did there come a point in time where
	7 Mr. Jam's entities?		7 you developed an understanding as to the purpose of this
	8 A That is correct.		8 \$150,000 payment?
	9 Q Okay. And at this time in 2011, you were		9 A As I said, if you can imagine we are a year or
13:18:08	10 providing accounting services for Integrated	13:20:43	10 two postdeadline and I'm trying to get these financials
	11 Administration?		11 to the government to -- the tax returns to the
	12 A That is correct.		12 government. So I'm relying on somebody that I had
	13 Q Okay. Let's take a look on page 17 of 127.		13 worked with for almost 20 years. So whatever he said,
	14 A Uh-huh.		14 representation of the client was my key and we acted
13:18:36	15 Q There is a transaction. It's for -- from the	13:21:06	15 upon those.
	16 bottom, November 23rd of 2011.		16 Q You took him at his word?
	17 A Uh-huh.		17 A Absolutely.
	18 Q And it's a \$150 -- sorry, excuse me, \$150,000		18 Q Okay. Do you recall whether you requested any
	19 transfer into the account from Swartz IP Services Group.		19 documentation to back up what he was saying?
13:18:58	20 Do you see that?	13:21:16	20 A No.
	21 A That's correct.		21 Q And you wouldn't have done that because you
	22 Q Okay. Do you know why Swartz IP Services was		22 took him at his word?
	23 paying \$150,000 to Integrated Administration at this		23 A Again, we wouldn't do that because we are not
	24 time?		24 required to do that. If there is something that I had
13:19:10	25 A No.	13:21:28	25 suspicious, I could have asked or I would ask, but at

Page 98		Page 100	
13:21:31	1 that point of time, no, I did not have any suspicion.	13:24:06	1 Swartz IP Services Group.
	2 Business was as usual. Kia is handling --		2 Do you see the first transaction there's a
	3 running these shows and telling me that, "Oh, this		3 \$50,000 deposit from Swartz IP?
	4 \$200,000 is coming from this person. Another 100,000		4 A I do.
13:21:47	5 coming from that person." I didn't have any reason to	13:24:12	5 Q And do you see the second one, \$150,000?
	6 doubt or to question.		6 A I do.
	7 Q Okay. As you sit here today, with respect to		7 Q Do you know the purpose of these --
	8 this particular payment, do you have any recollection --		8 A No.
	9 A No.		9 Q -- transfers?
13:22:03	10 Q -- what the purpose --	13:24:20	10 A No.
	11 A No.		11 Q And same as before, you're not aware that
	12 Q -- of it was?		12 Integrated Administration provided any goods or services
	13 A No.		13 to Swartz IP for these payments?
	14 Q Do you know whether Integrated Administration		14 A That is my understanding.
13:22:09	15 provided any goods or services to Swartz IP?	13:24:37	15 Q Let's look at 36.
	16 A No. I'd -- as much as I know, Integrated		16 A (Witness complies.)
	17 Administration was a payroll company, and they were not		17 Q I want to direct you first to three specific
	18 doing payroll for Swartz.		18 transactions: one on March 6th, 2012, one on March 9th,
	19 Q They didn't do payroll for Swartz IP?		19 2012, and one on March 13th, 2012.
13:22:24	20 A No. I don't recall.	13:24:57	20 A Uh-huh.
	21 Q Let's turn to the top of page 18.		21 Q The first is a \$300,000 payment from Swartz IP
	22 A (Witness complies.)		22 Services Group to Integrated.
	23 Q There is an 11/29 transfer from Swartz IP into		23 Do you see that?
	24 Integrated Administration account for \$300,000.		24 A Uh-huh.
13:22:45	25 Do you see that?	13:25:07	25 Q And the second one on March 9th is a \$100,000
Page 99		Page 101	
13:22:47	1 A That's correct.	13:25:09	1 payment from -- excuse me, from Swartz IP, excuse me, to
	2 Q Okay. Do you have an understanding as to the		2 Integrated.
	3 purpose of this payment?		3 Do you see that?
	4 A No.		4 A Uh-huh.
13:22:55	5 Q Do you recall if this was a payment that would	13:25:16	5 Q And the third one is a \$50,000 payment on
	6 have been discussed at the meeting that you had a couple		6 March 13th from Swartz IP to Integrated Administration.
	7 of years later?		7 Do you see that?
	8 A Must have.		8 A Uh-huh.
	9 Q Okay. But you have no specific recollection as		9 Q Okay. And is your testimony that you're not
13:23:06	10 to this?	13:25:26	10 aware of the purpose or reason for these payments?
	11 A No.		11 A That's correct.
	12 Q And I presume your answers are the same as they		12 Q And as far as you know, Integrated
	13 were before and that's that you're not aware of		13 Administration did not provide any goods or services to
	14 Integrated Administration providing any goods or		14 Swartz IP in exchange for these payments?
13:23:20	15 services to Swartz IP?	13:25:39	15 A That is correct.
	16 A That is correct.		16 Q Okay. Let me direct you to two other
	17 Q Okay. And that's true specifically for this		17 transactions on this page both on March 6th. The first
	18 transaction?		18 states, "Online transfer to business checking from
	19 A For all the transaction.		19 Integrated Administration to ZKCO for wire to Carol
13:23:31	20 Q Okay. Let's look at page 31.	13:25:57	20 Watson."
	21 A (Witness complies.)		21 Do you see that?
	22 Q And there are two transactions I want to direct		22 A I'm going to read it correctly.
	23 you to. The first is on February 2nd of 2012 and the		23 Q Sure.
	24 second is on February 9th of 2012. Both show that		24 A It says, "from MZ" meaning Majid Zarrinkelk.
13:24:02	25 Integrated Administration was receiving money from	13:26:04	25 Q I'm referring to the one above that.

Page 102		Page 104	
13:26:09	1 A Are you talking about the \$364,065,000?	13:28:59	1 Q That happened many times?
	2 Q I'm talking about the one for \$63,167.36.		2 A That happened many times.
	3 A Oh, so you're talking about the one that's -- I		3 Q Okay. Other than the transaction that you
	4 thought that you're referring to the incoming fund.		4 discussed earlier when you -- where you lent money to
13:26:24	5 Q No.	13:29:10	5 Mr. Bergstein personally, do you recall any instances
	6 A Okay.		6 when you lent money to an entity with which
	7 Q You see the one I'm referring to?		7 Mr. Bergstein was affiliated?
	8 A The 63,167.36?		8 A I do recall a given day. I don't know exactly
	9 Q Yes.		9 when it was that I lent about -- it was 500- or \$600,000
13:26:31	10 A Okay. "From IA to ZKCO to wire to Carol	13:29:37	10 to one of these entities or bunch of these entities.
	11 Watson." That's correct.		11 They needed the money that day and I lent them money and
	12 Q Okay. So were you serving as the facilitator		12 then the money came in from whatever sources and they
	13 for this transaction?		13 paid me back.
	14 A That is correct. This went to ZKCO wire to be		14 Q Okay. So you're referring to an entity with
13:26:45	15 sent to Carol Watson.	13:29:56	15 which Mr. Jam and Mr. Bergstein were affiliated?
	16 Q Do you know who Carol Watson is?		16 A Again, I did not transfer any money to
	17 A No.		17 Mr. Bergstein entities. I -- if -- if it was -- it was
	18 Q Okay. Now, let's look at the -- well, strike		18 IA or K.Jam Media or K.Jam Production.
	19 that.		19 Q That's who you lent money to?
13:27:03	20 Do you know why Integrated was using you to	13:30:16	20 A Yes.
	21 facilitate the transfer to Carol Watson at this time?		21 Q The specific \$500,000 transaction?
	22 A No, I don't. But this name of Watson seems a		22 A I think it was -- again, I remember one day in
	23 little bit more familiar. I believe one of the entities		23 one instance, it went as high as that. And then they
	24 that we were doing the payroll for was a company called		24 paid me -- I -- I believe they paid me back on the very
13:27:26	25 Watson, I think it was.	13:30:32	25 same day. It was just the timing they wanted to get --
Page 103		Page 105	
13:27:31	1 Q Let's look at the transaction --	13:30:34	1 wire to someone and their money has not arrived, so I
	2 A I think the reason why is this: Look at the		2 gave them the advance. And then as soon as the money
	3 incoming \$65,000 on 3/6, it says, "from MZ to IA, loan		3 came in, I took the money back.
	4 to pay Carol Watson." So I lent \$65,000 to IA because		4 Q Okay. Did you understand that the purpose of
13:27:57	5 they needed the money. And then they paid Carol Watson.	13:30:44	5 that payment was for the business that Mr. Jam and
	6 And then the money came ap- -- apparently later on. And		6 Mr. Bergstein were in?
	7 I took my \$65,000 on the very same day.		7 A What payment?
	8 Do you see that, it says, "IA to Majid Z,		8 Q This \$500,000 payment that you're referring to.
	9 return of advance."		9 A No. No. No. I -- I -- they asked me for the
13:28:15	10 Q Okay. So you're referring to this transaction	13:30:58	10 money I lent them.
	11 immediately below the one that we were discussing?		11 Q Who is they?
	12 A That is correct. That is correct.		12 A Again, Kia was asking me.
	13 Q Okay. So you personally lent money to		13 Q Okay.
	14 Integrated Administration at that time?		14 A "Can you, Majid" -- "we need \$500,000 or
13:28:26	15 A That is correct. There -- there have been	13:31:08	15 \$100,000 or \$200,000. Can you give us the money?"
	16 instances that they were short in cash and they needed		16 And I had line of credits and that sort of
	17 to meet the payroll and they asked me and I lent the		17 thing so I facilitated that.
	18 money.		18 Q And you said he -- he told you, "We need the
	19 Q Okay. When you're referring to "they," are you		19 money."
13:28:44	20 talking about --	13:31:22	20 Who is we?
	21 A IA.		21 A Kia Jam and his entities.
	22 Q Okay. Do you recall other instances when you		22 Q Okay.
	23 personally lent money to Mr. Jam or entities with which		23 A And in -- in -- in those days that David
	24 he's affiliated?		24 Bergstein was there, I knew for the fact that he does
13:28:57	25 A Many times. Many times.	13:31:35	25 not need this money for himself. This is all for

Page 106		Page 108	
13:31:43	1 transactions that David was handling, but I didn't know	13:34:18	1 Q Okay. And do you have an understanding of what
	2 what was those transactions for.		2 the purpose of this payment was to Mr. Swartz?
	3 Q Okay. But there were transactions that Mr. Jam		3 A No.
	4 was handling with Mr. Bergstein?		4 Q Do you know if Mr. Swartz provided
13:31:53	5 A Certainly, Kia was aware of what was going on.	13:34:27	5 consideration to Integrated Administration goods or
	6 I -- I did not know, but Kia certainly knew.		6 services?
	7 Q Okay. Let's turn to the next page, page 37,		7 A I don't believe so.
	8 and I'll direct you to two transactions; one is		8 Q Okay. Next page, please, page 40- --
	9 March 22nd, 2012 and the other one is March 26th, 2012.		9 A Again, let me correct myself. I don't know.
13:32:14	10 And you'll see payments received from Swartz IP Services	13:34:39	10 Q You don't know.
	11 Group for \$125,000 and one for \$40,000.		11 A I shouldn't say.
	12 Do you see those?		12 Q Okay. Page 44.
	13 A That's correct.		13 A (Witness complies.)
	14 Q Okay. And do you understand the purpose of		14 Q There is a transaction about middle of the
13:32:30	15 these payments?	13:34:48	15 page, April 25th, 2012, a 16,576-dollar payment from
	16 A No.		16 Integrated Administration to ZKCO for wire to AKS
	17 Q But it's your testimony that Integrated		17 Professional.
	18 Administration did not provide any goods or services to		18 Do you see that?
	19 Swartz IP in exchange for these payments?		19 A Uh-huh.
13:32:40	20 A That is my understanding.	13:35:05	20 Q Okay. So this is another instance where you're
	21 Q Okay. Let's look at page 43.		21 serving as a facilitator for a payment from Integrated
	22 A (Witness complies.)		22 Administration?
	23 Q And I want to direct you to the transaction on		23 A Uh-huh.
	24 April 16th of 2012. It's a \$20,000 payment. It appears		24 Q Yes?
13:33:12	25 to be from Integrated Administration to ZKCO for wire to	13:35:11	25 A That's correct.
Page 107		Page 109	
13:33:19	1 Jerome Swartz.	13:35:12	1 Q Okay. And this payment went to AKS
	2 Do you see that?		2 Professional?
	3 A That's correct.		3 A That's true.
	4 Q Okay. Do you recall this particular		4 Q And just as you testified before, AKS
13:33:21	5 transaction?	13:35:21	5 Professional would see that this payment or -- strike
	6 A I'm looking at it. I remember it now, but I		6 that.
	7 don't remember it eight years ago.		7 From AKS Professional's perspective, this
	8 Q Okay. So is this an instance where you were		8 payment would have been made from ZKCO and not from
	9 serving as a facilitator for a payment from Integrated		9 Integrated Administration?
13:33:39	10 to the end recipient, Jerome Swartz?	13:35:33	10 A That is correct. But there is a place in the
	11 A That's correct.		11 wire when you sent. It -- it says, "note to the
	12 Q Okay. So do you agree that as we saw before		12 beneficiary." And in those note to beneficiary, I
	13 with respect to the Pineboard transactions that the		13 always made it clear that this money is not coming from
	14 recipient of this payment would see that the monies were		14 ZKCO. It's coming from whoever was the sender.
13:33:59	15 coming from ZKCO and not from Integrated Administration?	13:35:52	15 Q Okay.
	16 A That is correct.		16 A But it doesn't show up here. It does show up
	17 Q Okay. Do you have an understanding of who		17 on the wire transfer. When the recipient receives that,
	18 Mr. Swartz is?		18 there's -- at the bottom, it says, "This is from K.Jam
	19 A No.		19 Production, K.Jam Media, or IA, whatever."
13:34:07	20 Q No.	13:36:10	20 Q And would that be reflected on the recipient's
	21 You never heard that name before?		21 bank statement?
	22 A No.		22 A Not that one on the statement. On the wire
	23 Q How about Jerome Swartz with a Z, does that		23 advice they received.
	24 change anything for you?		24 Q Okay. Do you know what AKS Professional is?
13:34:16	25 A No.	13:36:22	25 A No.

Page 110	Page 112
<p>13:36:23 1 Q You have no idea what that company is?</p> <p>2 A This one took -- I don't know. But number</p> <p>3 is -- is 16,500. It could have been a legal fee,</p> <p>4 attorney fee, service fee.</p> <p>13:36:37 5 Q You're not sure of the purpose of this payment?</p> <p>6 A No, I don't -- not -- not now, not today.</p> <p>7 Q Okay. Is it your testimony that sometime you</p> <p>8 were aware of the purpose of it?</p> <p>9 A I could have been.</p> <p>13:36:47 10 Q Okay. Let's look at page 50.</p> <p>11 A (Witness complies.)</p> <p>12 Q And the transaction on May 25th, 2012 is a</p> <p>13 \$150,000 payment from IA to ZKCO for wire to Graybox,</p> <p>14 LLC.</p> <p>13:37:11 15 Do you see that?</p> <p>16 A That's correct.</p> <p>17 Q So you're serving again as the facilitator --</p> <p>18 A Uh-huh.</p> <p>19 Q -- for this payment from Integrated -- just let</p> <p>13:37:16 20 me finish.</p> <p>21 A Sure.</p> <p>22 Q You're serving as the facilitator of this</p> <p>23 payment from Integrated Administration to Graybox?</p> <p>24 A That's correct.</p> <p>13:37:24 25 Q Okay. What's Graybox, LLC?</p>	<p>13:38:33 1 A No. I'm -- I'm surprised that now I see this</p> <p>2 many in- -- incoming funds from Swartz into IA because I</p> <p>3 don't -- I didn't have this understanding that there</p> <p>4 were so many of instances that Swartz IP was sending</p> <p>13:38:53 5 money to IA.</p> <p>6 Q Okay. Why are you surprised by that?</p> <p>7 A I am.</p> <p>8 Q You thought it was?</p> <p>9 A I -- I thought it was less frequent.</p> <p>13:39:02 10 Q You knew that monies were being transferred,</p> <p>11 but you didn't think it was this much?</p> <p>12 A Yes. I -- this is -- this surprises me. That</p> <p>13 frequency of that.</p> <p>14 Q Okay.</p> <p>13:39:11 15 A I knew that, overall, there was several million</p> <p>16 dollars, 2- or \$3 million, but I didn't know that there</p> <p>17 were so many 100,000, 200,000.</p> <p>18 Q Okay. But you didn't question it at the time?</p> <p>19 A No. No. No. I did not.</p> <p>13:39:25 20 Q Okay. And from your perspective --</p> <p>21 perspective, you had no reason to question it at the</p> <p>22 time?</p> <p>23 A No, I did not. In 2012, this was a brand-new</p> <p>24 company. I didn't have any particular reason.</p> <p>13:39:43 25 Q And with respect to this \$200,000 transaction,</p>
Page 111	Page 113
<p>13:37:26 1 A Graybox, LLC was a David Bergstein company.</p> <p>2 Q Okay. Do you know what business Graybox was</p> <p>3 in?</p> <p>4 A No.</p> <p>13:37:39 5 Q Okay. Do you know why Integrated</p> <p>6 Administration was transferring \$150,000 through your</p> <p>7 account to Graybox, LLC?</p> <p>8 A There was -- at the time, there was so much</p> <p>9 money coming in and going out. And they were saying</p> <p>13:37:55 10 that I'm borrowing from this fellow, I'm loaning it to</p> <p>11 that fellow, so Graybox was a receivable or payable on</p> <p>12 the financial statement of either IA or K.Jam Media.</p> <p>13 And so these funds were coming in and going out through</p> <p>14 those account.</p> <p>13:38:13 15 Q Okay. That's what Mr. Bergstein and Mr. Jam</p> <p>16 were telling you?</p> <p>17 A That's correct.</p> <p>18 Q Okay. Let's look at the transaction on</p> <p>19 May 31st, 2012. It's a payment of \$200,000 into</p> <p>13:38:26 20 Integrated Administration's account for Swartz IP</p> <p>21 Services Group.</p> <p>22 Do you see that?</p> <p>23 A That's correct.</p> <p>24 Q Okay. Do you have an understanding what the</p> <p>13:38:31 25 purpose of that payment is?</p>	<p>13:39:48 1 it's your testimony that Integrated Administration</p> <p>2 didn't provide any goods or services to Swartz IP for</p> <p>3 the payment?</p> <p>4 A That's my understanding.</p> <p>13:39:56 5 Q Okay. Let's look at page 53. And we see here</p> <p>6 the last transaction on that page is June 28th, 2012.</p> <p>7 It's a \$100,000 deposit into Integrated Administration's</p> <p>8 account from Swartz IP.</p> <p>9 Do you see that?</p> <p>13:40:19 10 A I do.</p> <p>11 Q That is -- this is another payment from Swartz</p> <p>12 IP; that's correct?</p> <p>13 A It looks like it.</p> <p>14 Q Okay. And do you know the purpose of this</p> <p>13:40:28 15 transaction?</p> <p>16 A I don't.</p> <p>17 Q Okay. And as before, your testimony is that</p> <p>18 Integrated Administration didn't provide any goods or</p> <p>19 services to Swartz IP for this payment?</p> <p>13:40:38 20 A That's correct.</p> <p>21 Q Okay. Page 57, please.</p> <p>22 A (Witness complies.)</p> <p>23 Q And there are three transactions on this page.</p> <p>24 I want to direct you to July 2nd, July 11th, and</p> <p>13:40:56 25 July 13th of 2012. The first is a \$200,000 payment</p>

Page 114		Page 116	
13:41:02	1 from -- from Advisory IP Services, Inc.	13:42:52	1 money, was there an agreement reflected in the writing?
	2 Do you see that?	2	A No. It was just -- Kia would call and say,
	3 A I do.	3	"Majid, we are short. Can you put 10,000, 20,000,
	4 Q Okay. And is it your understanding that	4	\$50,000?" And I would do that.
13:41:08	5 Advisory IP Services, Inc. is -- was formally known as	13:43:07	5 Q Okay. Would you -- is that something you
	6 Swartz IP Services Group?	6	routinely did for clients?
	7 A I did not know that.	7	A Not for all the clients, but for Kia, I did.
	8 Q You didn't know that.	8	Q How come for Kia? How come that's something
	9 Any reason to believe that's not true?	9	you would do for Kia?
13:41:20	10 A I -- I don't have any reason.	13:43:17	10 A Kia has been a -- a client, a family. And
	11 Q Okay. So do you have an understanding as to	11	something you need to understand. I'm not American.
	12 the purpose of this payment from Advisory IP Services to	12	I'm Persian.
	13 Integrated Administration?	13	Q Okay.
	14 A I don't.	14	A And it is in our culture that if I know that
13:41:33	15 Q Okay. And how about for the July 11th payment	13:43:30	15 William needs money and I do have fund, perhaps I would
	16 of \$100,000?	16	even volunteer even before he asked for it. This is --
	17 A I don't.	17	this is what we do for -- it's in our culture. So there
	18 Q And the third one, July 13th of 50,000?	18	have been many, many instances that I did not even wait
	19 A No, I don't.	19	for Kia to come and ask for money. And I knew that he
13:41:47	20 Q You're not sure of the purpose of that either?	13:43:54	20 was short. I would lent him the money. Right now, as
	21 A That is correct.	21	of today, as we speak, Kia owes me \$50,000 because he's
	22 Q Okay. And with respect to these three	22	short, and I lent him the money.
	23 payments, am I correct that Integrated Administration	23	Q Okay.
	24 didn't provide any goods or services for them?	24	A So it's more of a cultural than anything else.
13:41:57	25 A That is my understanding.	13:44:12	25 Q And so to this day, you wouldn't hesitate to
Page 115		Page 117	
13:41:58	1 Q Okay. Page 58, please.	13:44:15	1 loan money to Mr. Jam?
	2 A (Witness complies.)	2	A I would not hesitate to loan Kia, absolutely.
	3 Q There is a July 12th transaction. It's in the	3	Q Page 61, please.
	4 amount of \$20,000. And the statement states "online	4	A (Witness complies.)
13:42:10	5 principal payment." And it refers to a loan from	13:44:27	5 Q And the first transaction at the top shows a
	6 Integrated Administration to ZKCO --	6	credit to Integrated Administration for \$50,000. It's
	7 A I'm sorry. How much is the dollar amount?	7	posted on August 24th, 2012.
	8 Q Let me start again.	8	Do you see that?
	9 It's July 12th, 2012. It's the only	9	A That is correct.
13:42:24	10 transaction on that date. It's for \$20,000.	13:44:46	10 Q And is this another instance in which you're
	11 Do you see that?	11	loaning money to Integrated Administration?
	12 A Uh-huh.	12	A That is correct.
	13 Q Okay. And that entry refers to a loan from	13	Q And do you know if there was a particular
	14 Integrated Administration to ZKCO line return of	14	purpose for that loan?
13:42:34	15 advance.	13:44:55	15 A They must have been short, they needed money,
	16 Do you see that?	16	something --
	17 A That is correct.	17	Q Okay. So you lent money to Mr. Jam or his
	18 Q Do you know what that is?	18	entities both personally and on behalf of your firm?
	19 A Yes.	19	A Again, it is very clear in the description. Is
13:42:38	20 Q What can you tell me about it?	13:45:13	20 it from -- if it says "MZ," it means that it is my
	21 A Apparently, I must have lent them some money	21	personal fund. If it says "ZKCO," it means that my firm
	22 from ZKCO line of credit, and they are returning it.	22	fund. And then it says "line," and then it means that
	23 Q You lent Integrated Administration money?	23	it was a line of credit. And if you go further down the
	24 A That is correct.	24	road, I -- I had more than one line or one credit
13:42:50	25 Q Okay. In these circumstances where you lent	13:45:36	25 facility, so I would identify that as a -- from ZKCO

Page 118		Page 120	
13:45:41	1 \$200,000 line or from Majid, 500,000 or 100,000,	13:57:02	1 Again, I am in this new firm for a short period of time
	2 whatever.		2 and I'm going to retire within a year, so it never
	3 Q Okay. Let's look at page 65.		3 crossed my mind to ask that question. I would certainly
	4 A (Witness complies.)		4 ask that question when I get back to the office today.
13:45:49	5 Q And the transaction on September 19th, 2012,	13:57:16	5 Q Okay. So everything that you've been doing
	6 \$97,551.21.		6 with respect to these sorts of transactions on when you
	7 Do you see that?		7 were with ZKCO and when -- now with your new firm,
	8 A That's correct.		8 you've -- you've been doing that based on your -- your
	9 Q And is that an instance where Integrated		9 gut or your instinct; is that correct?
13:46:09	10 Administration is paying back a personal loan that you	13:57:30	10 A No, that's not correct. I have about 49 years
	11 made to the company?		11 of experience, and I've been doing this for that long.
	12 A This was -- that is correct.		12 And so -- therefore, if I sense that something is not
	13 Q And because the reference there is to MZ?		13 right, I don't do it. That's why I've -- I've -- I've
	14 A That is correct.		14 lived a very clear and headache-free life for my -- my
13:46:20	15 MR. LATZER: Can we take a two-minute break?	13:58:00	15 entire life. So no, it's not just a gut feeling. It's
	16 THE VIDEOGRAPHER: The time is 1:46 p.m. We		16 just a judgment that I do. And in case of -- perhaps,
	17 are now off the record.		17 the only mistake I ever made was loaning money to David
	18 (A recess was taken.)		18 Bergstein. But for others, I -- again, if I may give
	19 THE VIDEOGRAPHER: We are back on the record.		19 you an example, perhaps you never heard of that.
13:55:20	20 The time is 1:55 p.m.	13:58:32	20 This goes back about 15 to 20 years ago. I'm
	21 BY MR. LATZER:		21 doing someone's tax return, a client. And on
	22 Q Mr. Zarrinkelk, I want to ask you first with		22 April 10th, we meet. And -- and on April 12th or 13th,
	23 respect to your previous firm ZKCO.		23 I'm calling him, he's gone. He's gone to China. Back
	24 A Uh-huh.		24 then, there was no phone, text, or that sort of thing.
13:55:34	25 Q Did you have any written policies and	13:58:57	25 And he owed \$100,000 to government. I had no hesitation
Page 119		Page 121	
13:55:38	1 procedures in place to govern financial transactions	13:59:05	1 to pay that \$100,000 right there. And when he came back
	2 that the firm was involved in with -- in connection with		2 a week later, two weeks later, he thanked me, he
	3 clients?		3 reimbursed me. That was it. We never discussed it. It
	4 A No.		4 is understood that friends do this for each other.
13:55:52	5 Q No. Okay.	13:59:22	5 So if you understand that culture, then you see
	6 How about with respect to your current firm?		6 that this is not very abnormal, unethical. I'm very,
	7 A My current firm, of course, is much larger		7 very much aware of what I do. And I don't do things
	8 firm. They must have something. I'm not sure whether		8 that are unethical. One of the reasons that I did not
	9 they do.		9 take David Bergstein as a client because I never felt
13:56:08	10 Q Okay. And these -- the transactions that we	13:59:47	10 comfortable with him. Had I -- had I felt comfortable,
	11 just looked at where you were serving as the		11 it would have been very easy to convince him to give me
	12 facilitator, do you still serve as a facilitator on		12 all his clients, and I could have handled that.
	13 behalf of clients in -- in your capacity as an employee		13 Q But you felt comfortable enough to facilitate
	14 of your current firm?		14 all these transactions in which you knew he was
13:56:28	15 A Yes, I do.	14:00:04	15 involved?
	16 Q You do?		16 A Again, these were instruction coming from Kia,
	17 A I still do transfer of wires on behalf of Kia.		17 okay? And again, if you go back to 2011, this is a
	18 Q Just Mr. Jam as you serve as a facilitator for		18 Monday morning quarterbacking. Right now, you're
	19 any other clients?		19 looking back eight years and say, "Ugh, He's in jail.
13:56:41	20 A I do have other clients that if they need to	14:00:22	20 He was a criminal." So it must have been a criminal act
	21 wire funds, I do the very same thing for them.		21 then. I did not know that. I -- I never felt that it
	22 Q Okay. But your testimony is you're not aware		22 was the case.
	23 of any written policies or procedures governing those		23 Q You -- go ahead. I'm sorry.
	24 sort of transactions?		24 A Do you see what I'm saying?
13:56:57	25 A You brought it up. I never asked my new firm.	14:00:35	25 So therefore -- let me give you another

Page 122		Page 124	
14:00:39	1 example. When revolution happened in Iran, then the new	14:03:26	1 Q Okay. What happened to Mr. Shahab and his
	2 government forbid drinking. Drinking prior to then was		2 license?
	3 okay. Then when they found Majid Zarrinkelk's picture		3 A Mr. Shahab committed fraud, and I caused him to
	4 with a glass of wine, he was a criminal. But those		4 lose his --
14:01:06	5 days, it was not a crime to drink wine. But afterward,	14:03:35	5 Q Okay. When did that happen?
	6 it was. So as long as I did not drink wine after they		6 A Perhaps 2015.
	7 called it illegal, I don't think that I did anything		7 Q Okay. What was the nature of the fraud?
	8 wrong.		8 A He stole from a client.
	9 So this is the very same fact. Right now, we		9 Q From one of your clients?
14:01:27	10 are looking at all these transactions in light of	14:03:54	10 A Uh-huh.
	11 suspicion, doubt. He -- he was proved to be a criminal.		11 Q And did you report him to --
	12 But those days, they were not. So I did not have any		12 A I reported him to California Board of
	13 reason to believe that any of these transactions or any		13 Accountancy, and they revoked his license.
	14 instruction that came from Kia or came directly from him		14 Q Okay. So this is in the -- or strike that.
14:01:55	15 was with criminal intent or he was trying to defraud	14:04:15	15 This is an e-mail from November 23rd, 2011.
	16 anybody.		16 Have you seen this e-mail before?
	17 If -- if I had that sense, I would not have		17 A This e-mail is not addressed to me. So --
	18 done any of those, but I did not until these situations		18 therefore, we exchange sometimes 50, 60 e-mails with Kia
	19 started to evolve and then all of a sudden -- again,		19 during the day, so this was sent to him. And Ray
14:02:15	20 honest to God, I never felt comfortable with -- with	14:04:36	20 Shahab, at that point in time, was in charge of handling
	21 him. I found him a very shrewd businessman. David, I		21 the books of accounts of Kia's entities.
	22 mean. So therefore, I never pursued him to bringing him		22 Q Okay. So he was in charge of handling the
	23 as a -- as a client.		23 books and accounts for Mr. Jam and his entities in this
	24 Q Let me show you what's been marked as		24 2011, 2012, 2013 time frame?
14:02:38	25 Exhibit 41.	14:04:56	25 A That is correct. He was in -- in our firm and
Page 123		Page 125	
14:02:39	1 (Exhibit 41 was marked for	14:04:58	1 he was --
	2 identification by the Court Reporter		2 Q Okay. Did Mr. Shahab report to you?
	3 and is attached hereto.)		3 A Yes.
	4 BY MR. LATZER:		4 Q Okay. Did he work under your supervision?
14:02:40	5 Q And this is a November 23rd, 2011 e-mail from	14:05:07	5 A Yes.
	6 Mr. Jam to Mr. Shahab?		6 Q Okay. Did you review his work?
	7 A Yes.		7 A Yes.
	8 Q That's Ray Shahab?		8 Q Okay. Do you have an understanding as to why
	9 A Ray Shahab was my employee.		9 Mr. Jam was providing the information in this e-mail to
14:03:01	10 Q Okay. He was your employee when you were at	14:05:20	10 Mr. Shahab?
	11 ZKCO?		11 A This is -- this is the way that Kia used to
	12 A That is correct.		12 communicate, very brief. 150 coming into IA. Its
	13 Q Okay. And is he currently affiliated with your		13 income, 50K, keep for payroll next week. Move \$100,000
	14 firm now?		14 to K.Jam Media.
14:03:10	15 A Who -- no.	14:05:37	15 Q Okay. So these are the sorts of e-mails that
	16 Q Mr. Shahab.		16 you and your firm were receiving from Mr. Jam during
	17 A No.		17 this 2011, 2012, 2013 time frame?
	18 Q Okay. Is Mr. Shahab a CPA?		18 A Even today.
	19 A He was.		19 Q Even today. Okay.
14:03:17	20 Q He was.	14:05:48	20 But specifically focusing on this 2011 through
	21 Is he still a CPA?		21 2013 time frame -- well, let's look at the first line of
	22 A I don't know.		22 the e-mail. It says, "150 into IA."
	23 Q Okay.		23 Do you understand that that's a reference to
	24 A No. I know that he's not. I'm sorry. I		24 \$150,000 into Integrated Administration?
14:03:24	25 shouldn't say that.	14:06:09	25 A That is correct. Apparently, on that day,

Page 126		Page 128	
14:06:12	1 there was \$150,000 coming to IA. He's saying, "This is income."	14:08:38	1 the firm's practice to have that type of discussion with Mr. Jam?
	2	2	
	3 Q Okay. Now, we just looked at bank statements	3	A Yeah. We would ask him, "What is this for?"
	4 for Integrated Administration.	4	And he would say, "This is income from such and
14:06:23	5 A Uh-huh.	5	such source."
	6 Q And pull that exhibit, if you like. Please	6	And we normally used to document that in. When
	7 take a look --	7	we were recording them, we would make a reference to
	8 A Page 73 or --	8	him. In fact, in some of our entries, you would see
	9 Q One second.	9	that there's a reference to Kia, e-mail dated
14:06:46	10 A This is November 23rd.	10	November 13th -- 23rd, 2011. You would see that.
	11 Q Let's look at page 17.	11	Q Okay. And did you take any steps to ensure the
	12 A Seventeen?	12	accuracy of Mr. Jam's characterization of monies
	13 Q Yes.	13	received?
	14 A Oh, sorry. I'm a year ahead.	14	A We -- we would -- we would -- normally, again,
14:07:00	15 Uh-huh.	15	if we had any doubts or there was some misunderstanding
	16 Q Now, on page 17, there is a reference to your	16	or confusion, we would ask him a follow-up question.
	17 transaction that we just discussed.	17	But normally, when he says it's income, we would take it
	18 A Uh-huh.	18	as income. When he says it's a loan, we would call it a
	19 Q And that's \$150,000 payment --	19	loan.
14:07:06	20 A Uh-huh.	20	Q Okay. And then the fourth line of the e-mail
	21 Q Just let me -- let me finish.	21	says, "Move the 100K we just discussed to K.Jam."
	22 There's a \$150,000 payment received by	22	Do you see that?
	23 Integrated Administration from Swartz IP.	23	A That's correct.
	24 A Uh-huh.	24	Q And K.Jam was a reference to --
14:07:15	25 Q So is your understanding that this \$150,000	25	A K.Jam Media.
Page 127		Page 129	
14:07:18	1 payment is referring to the transfer from Swartz IP?	14:09:48	1 Q K.Jam Media. Okay.
	2 A That is correct.	2	And K.Jam Media, I believe you described
	3 Q Okay. And Mr. Jam is instructing you --	3	earlier, was the entity through which Mr. Bergstein and
	4 Mr. Shahab to report this as income?	4	Mr. Jam were conducting business?
14:07:29	5 A That is correct.	5	A That is correct. We started to segregate the
	6 Q Okay. Do you have an understanding of what	6	transaction that had something to do with Mr. Bergstein
	7 Mr. Jam meant by "income"?	7	in keeping it separate than K.Jam Production.
	8 A Not -- not now. It -- it must have been his	8	Q Okay. And to do that, you used K.Jam Media?
	9 interpretation. Kia Jam does not have a very good	9	A That is correct.
14:07:48	10 understanding of what is income, what is not income.	10	Q Okay. And then as you keep reading the e-mail,
	11 And even today, sometimes he receives some funds and he	11	it says, "Here is what is happening with it in KJM."
	12 says, "Majid, this is reimbursement of expenses."	12	And then there are four transactions listed. \$40,000 to
	13 I say, "No. This is your income."	13	Sahid Aframi- --
	14 Because we take the expenses to expense. So	14	A Aframian.
14:08:07	15 therefore, when you get reimbursed, it's income. In his	15	Q Okay. For balance of inventory transaction.
	16 mind, it's not. So therefore, he's -- he's trying to	16	A Uh-huh.
	17 suggest that this \$150,000 -- this particular \$150,000	17	Q Do you see that?
	18 is income.	18	A Yes.
	19 Q Okay. Do you know if Mr. Shahab or anyone on	19	Q Do you know what that term reference to?
14:08:24	20 behalf of your firm had a discussion with Mr. Jam at	20	A I recall in those days David started to buy
	21 this time about this characterization of the \$150,000 as	21	some gold or antiques. And they were going to -- this
	22 income?	22	was my understanding very, very briefly. This came up
	23 A I don't recall today, but we discussed eight	23	that they were buying gold. They were buying antiques
	24 years ago.	24	for sale. Okay. So apparently, they bought something
14:08:36	25 Q Okay. Would that have been your practice or	25	from Aframian and -- and this is the payment for balance

Page 130			Page 132		
14:11:05	1	of that -- whatever they bought.	14:13:15	1	Q -- any documents to back those up?
	2	Q Okay. And so you're talking about Mr. Jam and		2	A Again, if the money is a loan coming in and
	3	Mr. Bergstein bought something from this gentleman?		3	going out, it's -- it's -- it's not going to affect the
	4	A That is correct.		4	income statement. So I'm less concerned about that than
14:11:16	5	Q Okay.	14:13:30	5	if the money is -- I'm deducting it for tax purposes, so
	6	A I don't think that Kia was buying anything from		6	I need to be more careful. And if I'm reporting it as
	7	him. But it must have been David, because Kia is not in		7	income, I need to be more careful as to whether they are
	8	the business of buying anything tangible.		8	income or what.
	9	Q He is not in the business of buying anything		9	Q Your testimony is that the money from Swartz IP
14:11:31	10	tangible?	14:13:44	10	was a loan?
	11	A Yes. He's not in the business of buying gold		11	A I did not say that all the payments from Swartz
	12	or this or that.		12	was from loan. I'm saying that I saw -- I do recall
	13	Q Okay.		13	seeing that money coming in from Swartz that we credited
	14	A He's -- he's a movie producer.		14	to it payable, not as an income.
14:11:40	15	Q Okay. How about the next transaction, 10K to	14:14:05	15	Q Okay. What do you mean you credited it to a
	16	Allen Lee for consulting services?		16	payable?
	17	A Sure.		17	A Meaning that we considered that as a loan.
	18	Q What do you recall about that?		18	Based on the instruction that we received, they said
	19	A Again, apparently, there was a person named		19	this is -- remember that I told you that we had a
14:11:51	20	Allen Lee, and they owed \$10,000 consulting fee. So	14:14:15	20	meeting with the -- I know what was the purpose of all
	21	he -- he's trying to tell us what to do with that		21	these incoming money or outgoing money, so I invited Kia
	22	\$10,000.		22	to come and Kia came and laid out and said, "Okay. Take
	23	Q Do you know who Mr. Lee is?		23	this to income. This is income. This is loan," so we
	24	A I don't know.		24	followed that.
14:12:03	25	Q You don't know what consulting services he may	14:14:35	25	Q Okay. But with respect to this \$150,000
Page 131			Page 133		
14:12:06	1	have provided?	14:14:36	1	payment from Swartz IP in November 23rd, 2011, that was
	2	A No, sir. I mean, again, I -- even if I knew		2	characterized not as a loan but as income?
	3	these back then, right now, I don't recall.		3	A That is correct.
	4	Q Okay. How about the next payment, 9K to Jerry		4	Q Okay.
14:12:16	5	Swartz for expense reimbursement?	14:14:46	5	A Again, I'm -- I'm not going to bet that that
	6	A Again, the same thing.		6	was a correct characterization by him.
	7	Q Okay. You don't know what expenses that refers		7	Q Okay. But what about documents that
	8	to?		8	substantiate that one way or the other?
	9	A No. Again, those -- every payment that we		9	A Again, if -- if someone is telling me that
14:12:26	10	made -- or I should say 99 percent of the payments we	14:14:59	10	\$150,000 money coming in as income and I'm going to pay
	11	made, there must have been a document behind it. So we		11	taxes on that, I'm less inclined to ask for additional
	12	wouldn't just pay \$10,000 to you without document. We		12	information than when somebody's paying \$150,000 as
	13	would ask for a copy of invoice or something to		13	expense.
	14	substantiate the payment.		14	Do you see what I'm saying?
14:12:47	15	Q And you think that that's true with respect to	14:15:18	15	Q Okay. So for transactions that are
	16	these sorts of transactions from which you receive		16	characterized as expenses, you -- your practice is to
	17	instruction from Mr. Jam?		17	ask for backup documentation?
	18	A Again, we would -- for payments, we would try		18	A That's naturally what we are more -- more
	19	to collect documentation in order to back up. Because		19	concerned.
14:13:06	20	if he was going to be audited, we needed to have	14:15:29	20	Q But your practice is generally not to do that
	21	substantiation.		21	with respect to transactions characterized as income?
	22	Q Okay. But what about with respect to all the		22	A Not necessarily.
	23	transactions we just looked at from Swartz IP, do you		23	Q And how about transactions characterized as
	24	have --		24	loans?
14:13:15	25	A Again --	14:15:38	25	A Not necessarily. We -- we re -- we ask for

Page 134	Page 136
<p>14:15:42 1 information for -- to substantiate whether the funds are</p> <p>2 income or loans. But again, in -- in case of what was</p> <p>3 happening during this period of time, we were not</p> <p>4 collecting -- we were not getting all the information on</p> <p>14:16:03 5 a timely manner. So therefore, even filing of the tax</p> <p>6 return was delayed for a year or two, and then at that</p> <p>7 point of time, we relied on the assessment of the -- or</p> <p>8 representation of the management of the company.</p> <p>9 Q Okay. And you couldn't do it at the time</p> <p>14:16:21 10 because the money was coming in too quickly?</p> <p>11 A There -- yes. There was so -- so many things</p> <p>12 was happening. And keep in mind that we were not inside</p> <p>13 their business. We are sitting in our office, and</p> <p>14 everything is happening in LA. And we are just trying</p> <p>14:16:37 15 to capture all these transactions one at a time.</p> <p>16 Q Too much to keep up?</p> <p>17 A Too much to keep up. That's correct.</p> <p>18 Q And the second to the last line of the e-mail</p> <p>19 says, "sending you all the backup today by UPS."</p> <p>14:16:54 20 A That is correct.</p> <p>21 Q Do you -- do you recall whether you, in fact,</p> <p>22 received backup?</p> <p>23 A We certainly must have received them.</p> <p>24 Q Okay. And that was backup with respect to all</p> <p>14:17:03 25 of the transactions on here?</p>	<p>14:18:23 1 Do you see that?</p> <p>2 A Yes.</p> <p>3 Q Do you know why Mr. Shahab copied you on this</p> <p>4 e-mail?</p> <p>14:18:30 5 A This is a responsibility of the employees to --</p> <p>6 every e-mail that they would send out, we were supposed</p> <p>7 to be copied. That was our demand.</p> <p>8 Q That was your firm's practice?</p> <p>9 A That is correct.</p> <p>14:18:43 10 Q Okay. And the prior e-mail we looked at, you</p> <p>11 weren't copied on?</p> <p>12 A Again, I said my employees, not the clients.</p> <p>13 The clients can send e-mail to whoever they want.</p> <p>14 Q Okay. Understood.</p> <p>14:18:55 15 So your recollection is that if Mr. Shahab send</p> <p>16 an e-mail to Mr. Jam, you would have been copied on it?</p> <p>17 A 99.9 percent of the time.</p> <p>18 Q Okay. And is that because you were overseeing</p> <p>19 Mr. Shahab's work?</p> <p>14:19:11 20 A That is correct.</p> <p>21 Q Okay. So KJP, which is referenced in the</p> <p>22 e-mail, is Kia Jam Productions?</p> <p>23 A That is correct.</p> <p>24 Q And KJM is K.Jam Media?</p> <p>14:19:26 25 A That is correct.</p>
Page 135	Page 137
<p>14:17:05 1 A Uh-huh. Except -- perhaps, except the income.</p> <p>2 But for all the expenses, he knew that he had to send us</p> <p>3 the backup.</p> <p>4 Q Let me show you what I'm marking as 42.</p> <p>14:17:31 5 (Exhibit 42 was marked for</p> <p>6 identification by the Court Reporter</p> <p>7 and is attached hereto.)</p> <p>8 BY MR. LATZER:</p> <p>9 Q Okay. Mr. Zarrinkelk, I'm showing you what's</p> <p>14:17:44 10 been marked as Exhibit 42. And it's a two e-mails</p> <p>11 exchanged on November 29th, 2011.</p> <p>12 Do you see that?</p> <p>13 A I do.</p> <p>14 Q Okay. Now, the -- the second e-mail on the</p> <p>14:17:56 15 page, but the earlier of the two, is an e-mail from Ray</p> <p>16 Shahab to Mr. Jam with you copied.</p> <p>17 A Uh-huh. Uh-huh.</p> <p>18 Q Do you see that?</p> <p>19 A Uh-huh.</p> <p>14:18:07 20 Q Do you recall receiving this e-mail?</p> <p>21 A Yes, I do.</p> <p>22 Q Okay. So this e-mail from Mr. Shahab states,</p> <p>23 "Hi, Kia. I will record all the transactions and e-mail</p> <p>24 you the cash ledger for KJP, KJM, and IA tomorrow</p> <p>14:18:23 25 morning. Thanks."</p>	<p>14:19:26 1 Q Okay. Now, what's Mr. Shahab referring to when</p> <p>2 he writes the cash ledger?</p> <p>3 A Okay. This is -- this is what we -- for the</p> <p>4 clients that we were handling their cash, we send them</p> <p>14:19:43 5 two reports; one by the 15th of the month -- by -- one</p> <p>6 by the end of the month. That -- in that report, it</p> <p>7 shows all the cash transactions in their account;</p> <p>8 incoming, outgoing, all the expenses, everything.</p> <p>9 So therefore, as you see, this is on 29th of</p> <p>14:20:01 10 November and he says, "I'll send it tomorrow." Meaning</p> <p>11 that we cut the checks on the 15th or for the 15th and</p> <p>12 for the 30th of the month. So as soon as we got the</p> <p>13 checks, we reconcile the bank account and then we send</p> <p>14 them a general ledger that shows all the transaction.</p> <p>14:20:22 15 That's how we keep this type of clients informed about</p> <p>16 what is happening in their cash account.</p> <p>17 Q Okay. Those -- those were the services that</p> <p>18 you provided for Mr. Jam and for his entities; is that</p> <p>19 correct?</p> <p>14:20:38 20 A For Mr. Jam and alike.</p> <p>21 Q And -- and I'm sorry, what?</p> <p>22 A And alike. The com- -- the other companies</p> <p>23 that we do this type of service.</p> <p>24 Q Okay. Now, in his response also sent on</p> <p>14:20:53 25 November 29th, 2011, Mr. Jam writes, "In part, here are</p>

Page 138			Page 140		
14:20:57	1	a few more for IA to be entered."	14:23:19	1	None -- none or whatsoever. That's my understanding.
	2	And there is -- the first reference is a 40K		2	Again, I am sitting in the Orange County, and
	3	wire to the Bergstein trust.		3	all these communications are going back and forth with
	4	Do you see that?		4	phone calls, with e-mails. Okay. So that's the
14:21:07	5	A Uh-huh.	14:23:34	5	understanding that I had. Whether it's right or wrong,
	6	Q Do you have an understanding of what the		6	it is my understanding.
	7	Bergstein trust is?		7	BY MR. LATZER:
	8	A Apparently, David Bergstein had a trust.		8	Q But you testified earlier that Mr. Jam is a
	9	Q Okay. Do you know anything about that trust?		9	grown man; right?
14:21:17	10	A No.	14:23:43	10	A That is correct.
	11	Q You don't know who the beneficiaries are?		11	Q And he was acting voluntarily here?
	12	A No. No.		12	A I said -- you asked me a question, specifically
	13	Q Okay.		13	question about whether someone can do something
	14	A I didn't even know Bergstein had two kids until		14	voluntarily. I said, "No. Grown-up man can do that or
14:21:27	15	lately. So I didn't know much about David Bergstein.	14:23:56	15	can be forced to do volun-" -- "voluntarily."
	16	Q Okay. Do you have an understanding of why		16	Q And is it your understanding that at the time
	17	Integrated Administration was transferring \$40,000 to		17	that these transactions are happening that Mr. Jam was
	18	the Bergstein trust?		18	benefiting financially?
	19	A Again, these are all the monies that were		19	A Mr. Jam never benefited. Not ever. Not even a
14:21:45	20	coming in and going out. It was under his control. He	14:24:16	20	penny. I can say it right here, you can put me on the
	21	knew what they were, and he would direct to Kia as to		21	stand in the court. I would say the very same thing.
	22	what to do with those funds. Kia had no control.		22	Had it done, he would not have been in this financial
	23	None -- none whatsoever.		23	disaster situation that he cannot even afford to pay his
	24	Q Okay. This e-mail is --		24	mortgage payment, and I helped him to do that. Ever.
14:22:05	25	A Is from Kia.	14:24:36	25	He never. If he took a million-dollar or \$5 million
Page 139			Page 141		
14:22:06	1	Q Is from -- let me just finish.	14:24:41	1	from David Bergstein and took it to Cayman Island and
	2	This e-mail is from Kia and Mr. Bergstein is		2	bought a mansion there, I'm not aware of that. But the
	3	not on it?		3	ones that I know, he never ever, ever, in my opinion,
	4	A Of course not.		4	benefited from him. Ever. Not even a penny.
14:22:11	5	Q Okay. So is it your testimony that Mr. Jam was	14:25:01	5	Q Are you aware that monies from Swartz IP were
	6	not acting voluntarily in sending this e-mail?		6	used to pay off Mr. Jam's American Express cards?
	7	A Oh, I did not say that. He did not act		7	A It could have been. Again, this -- it was not
	8	voluntarily. I'm -- I'm saying Kia was conveying David		8	used to pay Mr. Kia Jam's charges. It was used to pay
	9	Bergstein instruction to us. In fact, he did -- he's		9	Mr. David Bergstein's charges.
14:22:31	10	saying that, "Ray Shahab, for tomorrow's report, please	14:25:18	10	Q Your testimony is that in all the instances
	11	include these additional transactions that we've done."		11	that Swartz IP, his money was used to pay off American
	12	Apparently, they had transferred \$40,000 wire		12	Express cards in Mr. Jam's name, and there were no --
	13	to Bergstein trust, another 30 to Graybox, which we did		13	then on a single transaction that benefited Mr. Jam
	14	not know. So he's informing us to incorporate that in		14	personally?
14:22:50	15	our report for the next day.	14:25:32	15	A I do not say that. I do not say that.
	16	Q Okay. Is it your testimony that Mr. Jam was		16	Q What did he say?
	17	incapable of refusing an instruction from Mr. Bergstein?		17	A I am saying that if there was a payment to --
	18	MR. MIGLER: It misstates testimony.		18	to American Express was for the charges that Mr. David
	19	THE WITNESS: Huh?		19	Bergstein put on Kia Jam's credit card. Okay. David
14:23:01	20	MR. MIGLER: I was -- I was objecting that that	14:25:51	20	Bergstein did not have the courtesy of helping Kia when
	21	misstate -- misstated your testimony.		21	Kia was assuming \$700,000 tax liability that he imposed
	22	THE WITNESS: That is correct. I -- I never		22	upon him. And his house right now is being foreclosed
	23	said that. But I believe that Kia was under absolute,		23	by IRS for -- for that. He did not have that decency to
	24	absolute control of David when it came to the money and		24	do that.
14:23:16	25	what to do with those funds. He had no control.	14:26:12	25	Q So --

Page 142		Page 144	
14:26:12	1 A I'm sorry. That I'm -- I'm getting beyond.	14:29:09	1 person can respond to his e-mail.
	2 Q So if Mr. Jam wasn't benefiting in any way		2 Q Okay. Let me direct you to the middle of this
	3 financially from this arrangement with Mr. Bergstein, I		3 e-mail, where Mr. Jam writes, "That leaves the balance
	4 understand that's your testimony that why was he		4 of 110. From this, we will need to replenish the 16K
14:26:26	5 involved in the arrangement?	14:29:40	5 wire from earlier today. You will know that I dipped
	6 MR. MIGLER: Calls for spe- --		6 into the payroll tax reserve in order to send the wire
	7 THE WITNESS: You -- you --		7 this morning for 16K to Jam's."
	8 MR. MIGLER: -- calls for speculation.		8 Do you see that?
	9 THE WITNESS: You need to ask Mr. Jam. You		9 A Yes, I do.
14:26:33	10 need to ask Mr. Jam --	14:29:49	10 Q Okay. What's the reference in that sentence to
	11 BY MR. LATZER:		11 the payroll tax reserve?
	12 Q Okay.		12 A When we set up the account, the payroll tax
	13 A -- why he was involved in that.		13 money was a substantial amount. Because we were running
	14 Q You never asked him that question?		14 a big num- -- big number payrolls. And so therefore,
14:26:41	15 A Again, there are certain things in our culture	14:30:13	15 taxes, we wanted to make sure that we have the money to
	16 that you don't ask a grown-up man as to what you do, but		16 pay the taxes. So if I'm not mistaken, we created the
	17 I have confessed to his father that your son is dealing		17 separate account. I'm not sure whether there was a real
	18 with a man who is not a -- who is not a good man and is		18 bank account, but we kept it -- the taxes in a separate
	19 affecting his life. Because as a father, I felt that		19 account.
14:27:12	20 it -- it was my responsibility. Without disclosing my	14:30:30	20 So therefore, we could pay the taxes when they
	21 client's information, I confessed that with his father.		21 were coming due. And taxes normally is due, if you get
	22 Q When?		22 paid by Friday, the taxes are due Wednesday. If you get
	23 A About two years ago.		23 paid by Monday, taxes is due by Friday. So therefore,
	24 Q Okay.		24 we did not have much time to pay the taxes, and we would
14:27:22	25 MR. LATZER: Forty-three. Thanks.	14:30:50	25 normally process the payment of the taxes the same day
Page 143		Page 145	
14:27:48	1 BY MR. LATZER:	14:30:55	1 that we process the payroll. Apparently, he's making
	2 Q All right. I'm going to show you what's marked		2 reference that he's -- he knew that there was some funds
	3 as Exhibit 43.		3 in there, and he needed \$16,000 of that, and he used it
	4 (Exhibit 43 was marked for		4 and he -- he's putting it back.
14:27:51	5 identification by the Court Reporter	14:31:11	5 Q Did you have any concern with him as he
	6 and is attached hereto.)		6 describes it dipping into the payroll tax reserve?
	7 BY MR. LATZER:		7 A No.
	8 Q This is a December 8th, 2011 e-mail from		8 Q No.
	9 Mr. Jam to Mr. Shahab with you copied; correct?		9 Now, what's Jams?
14:28:11	10 A That's correct.	14:31:18	10 A (Reading.)
	11 Q Okay. And do you recall receiving this e-mail?		11 J-A-M. Not really, I don't know. So let me
	12 A I must have.		12 read it. "From this, we need to replace 16K wire from
	13 Q Okay. And this is another instance in which --		13 earlier today. You know that I dipped into the payroll
	14 which -- in which Mr. Jam is providing you and		14 tax reserve in order to send the wire this morning for
14:28:28	15 Mr. Shahab with instruction as to how to disburse funds	14:31:46	15 the 16K to Jams."
	16 that were being deposited into Integrated		16 Jams. No, I don't know what JAMS stands for.
	17 Administration's account; is that correct?		17 Q Okay. And the e-mail continues. This leaves
	18 A That is correct. As you see, before the money		18 94K. The next paragraph states, "There are 40K in
	19 comes in, they tell us how to spend it.		19 charges on the Amex today for the next bill. Move 40K
14:28:46	20 Q Now, this -- on this e-mail, Mr. Jam copied	14:32:03	20 into KJP, and hold there until the next bill shows up.
	21 you.		21 The charges are 25K for AM House, 10K to Bohemia and 5K
	22 Do you have an understanding as to why he		22 to Pottery Barn."
	23 copied you on this one but not the previous one?		23 Do you see that?
	24 A I asked Kia to copy all his e-mails to me, so		24 A Uh-huh.
14:29:04	25 if Ray or any employees are not there, at least a second	14:32:20	25 Q Okay. Now, Mr. Jam is instructing you to move

Page 146		Page 148	
14:32:25	1 40K into KJP; correct?	14:34:39	1 to pay his personal American Express.
	2 A Yeah.		2 Q Okay. So at least this money from Integrated
	3 Q That's Kia Jam Productions?		3 Administration was going toward paying off a personal
	4 A That's correct.		4 expense with Mr. Jam?
14:32:32	5 Q Okay.	14:34:51	5 A Again, Mr. Jam was using all this funds to pay
	6 A Because he doesn't want to spend that money.		6 for everything, and if there is one particular instance
	7 So he's just trying to be conservative and take the		7 that he's referring to his personal, yes, you could say
	8 money out of the IA account. Okay. So at least, we can		8 that.
	9 pay the American Express.		9 Q Okay. He's using it to pay off everything as
14:32:50	10 Q Okay. Now, KJP is Kia Jam Productions?	14:35:08	10 you said --
	11 A That is correct.		11 A That is correct.
	12 Q And that's Mr. Jam's entity?		12 Q -- that would include transactions related to
	13 A That is correct.		13 Mr. Bergstein?
	14 Q Okay. Did Mr. Bergstein have any involvement		14 A That is correct. As you see --
14:32:59	15 or affiliation with KJP?	14:35:14	15 Q From that --
	16 A No.		16 A -- on the top it says, "50 went to Heritage
	17 Q Okay. So he wants the money to be transferred		17 Media, 50 went to Bergstein trust, 40 went to Graybox."
	18 from Integrated into his own company?		18 So he's allocating the funds. He wants to make sure
	19 A He wanted to safeguard that \$40,000 of that, so		19 that his credit cards are paid, too.
14:33:14	20 when those tax -- when those American Express or the	14:35:28	20 Q So everything would also include transactions
	21 other payments become due, we have the money. Because		21 that benefited Mr. Jam, personally?
	22 if the money was sitting there in IA, David Bergstein		22 A Again --
	23 would have come up at some reason to take it out or send		23 Q And, in fact, we just saw one here, the
	24 it to himself or to send it to Graybox or do something.		24 American Express house.
14:33:34	25 Q Okay. Because he wants to be able to pay off	14:35:39	25 A The way that you looked at it, it seemed as if
Page 147		Page 149	
14:33:36	1 his own American Express bill?	14:35:42	1 he's benefiting from it. But the fact of the matter is
	2 A Not own the American Express bill and other		2 he was working there. Okay. So therefore, if he was
	3 bills, Bohemia, Pottery Barn, whatever they were.		3 not getting paid for his salary, because if you look at
	4 Q Is it your understanding that these three		4 the IA payroll, he was paid for just a period of time,
14:33:48	5 charges, the 25K to AM House, the 10K to Bohemia, the 5K	14:36:02	5 and then never paid a salary. Never ever paid a salary
	6 to Pottery Barn, are charges that are showing up in the		6 for all these years.
	7 American Express bill?		7 So therefore, if there was a source of fund
	8 A That is correct.		8 that was used to pay for his company's account, you
	9 Q Okay. And again, just to be clear, the		9 could -- you could say that he benefited from that, yes,
14:33:58	10 American Express bill is a card in his name?	14:36:23	10 there was. But these funds were coming in all together,
	11 A That is correct.		11 and they were going all disbursed. And I cannot sit
	12 Q Okay.		12 here and tell you that this \$25,000 was purely giving
	13 A I -- I'm not sure whether it was under his		13 Kia personal benefit because Kia could have borrowed
	14 personal name, or had -- right now, I have an American		14 \$100,000 from his friend and put it in that IA account
14:34:10	15 Express says Majid Zarrinkelk, then underneath says	14:36:51	15 to pay for the payroll of IA.
	16 ZKCO. So -- and then I have another American Express		16 Q You said that Mr. Jam didn't receive a salary
	17 that says Majid Zarrinkelk only.		17 from Integrated Administration?
	18 Q Do you what --		18 A No, I did not say that. I said he received
	19 A So what --		19 salary for a period of time.
14:34:17	20 Q Sorry.	14:37:03	20 Q Okay. Do you know what period of time that
	21 Do you know what AM house is?		21 was?
	22 A American -- American Express house. I believe		22 A I think at the beginning of 2000 -- when they
	23 he might be re- -- referring to -- we do have an account		23 started off the IA. They -- they had -- he was getting
	24 called "house account," which is his personal bank		24 salary.
14:34:34	25 account. Okay. So he -- he could have needed \$25,000	14:37:14	25 Q So in --

Page 150		Page 152	
14:37:15	1 A He was getting -- David was getting -- David's	14:39:20	1 expecting me to know what was the \$10,000 paid for
	2 wife was getting -- yes, they were. They were.		2 Bohemia or \$5,000 Pottery Barn, would you remember what
	3 Q Okay. And so I'm just trying to narrow down		3 you did eight, nine years ago? I wouldn't.
	4 that period when you think you -- when you think he was		4 Q These documents that you're referring to that
14:37:28	5 receiving a salary.	14:39:37	5 may refer or substantiate these sort of payments, are
	6 A Again, I don't recall. The books and		6 those documents that you turned over to the government?
	7 financials that we provided has all those details.		7 A Absolutely. And Mr. Weichert.
	8 Q Okay. And what -- why was Mr. Jam entitled to		8 Q All right. Let me show you what I'll mark as
	9 a salary from Integrated Administration?		9 Exhibit 44.
14:37:37	10 A What's that?	14:40:13	10 (Exhibit 44 was marked for
	11 Q Why was Mr. Jam entitled to a salary from		11 identification by the Court Reporter
	12 Integrated Administration?		12 and is attached hereto.)
	13 A I -- I supposed he was one of the employees of		13 BY MR. LATZER:
	14 this big organization, and he was getting salary for		14 Q And, Mr. Zarrinkelk, I placed in front of you
14:37:49	15 that.	14:40:38	15 document, Exhibit 44. It's an e-mail from you to Jeff
	16 Q What services was he providing Integrated		16 Solomon, Mr. Jam, and Mr. Bergstein with Mr. Shahab
	17 Administration?		17 copied, and it's dated January 20th, 2012.
	18 A He was managing -- he was working for David, so		18 I'll give you a minute to flip through it, if
	19 therefore, he was getting paid for that. I -- I suppose		19 you would like.
14:38:00	20 that was the case.	14:40:59	20 A Yes, sir.
	21 Q Okay. But Integrated Administration was		21 Q Okay. Do you recall sending this e-mail?
	22 Mr. Jam's company?		22 A Uh-huh.
	23 A Integrated Administration never was Kia Jam's		23 Q Okay. And -- and what prompted you to send
	24 company. It was David's company. Absolutely David's		24 this e-mail?
14:38:16	25 company. Never was. It was just Kia who was signing	14:41:06	25 A This is the list of those entities that I was
Page 151		Page 153	
14:38:19	1 for all this time. That's why he ended up being charged	14:41:11	1 referring to that I saw in a meeting with David
	2 for the payroll taxes that was not paid.		2 Bergstein when we met him in L.A. And as you see, this
	3 Q And is it your testimony that some of the		3 is January of 2012; right?
	4 services that Mr. Jam was providing Integrated		4 We met -- if I'm not mistaken, we met in
14:38:34	5 Administration was facilitating these transfers of	14:41:27	5 December of 2011. Again, some -- somewhere around
	6 monies?		6 that -- that time. And in that meeting, these papers
	7 A No, I'm not saying that.		7 were circulated amongst all the people that there were
	8 Q No.		8 there.
	9 So I'm trying to understand what services he		9 So therefore, we still had this idea or
14:38:42	10 was providing Integrated Administration.	14:41:46	10 understanding that some of them might become my clients.
	11 A You need to ask Mr. Jam.		11 Okay. So therefore, I am just telling him that, please,
	12 Q Okay. How about the next charge, the 10K to		12 review this list. Okay. Attach No. 373 is CAC-7 is
	13 Bohemia, do you know what that is?		13 Integrated Administration. Okay. And from the group --
	14 A No.		14 and from the first group and two and three from the
14:38:52	15 Q Okay. Do you know what Bohemia is?	14:42:12	15 page 4, okay, which is Kia Jam Media, Kia Jam, KJMI
	16 A No.		16 Holding, Pagoda RNT. These are -- these are the
	17 Q How about 5K to Pottery Barn?		17 entities that I picked out of this group or whether was
	18 A No.		18 on this list. I was just trying to tell him that we
	19 Q Do you know if that was used to pay off monies		19 need to treat them differently for tax purposes.
14:39:00	20 that Mr. Jam spent at Pottery Barn?	14:42:37	20 Q Okay. Now, this -- the second page of the
	21 A I don't know. Again, these are all records in		21 document, the comp- -- it says "company summaries,
	22 our books. So if you go and refer to the books, then I		22 January 13, 2012."
	23 can tell you whether it was loan, it was personal		23 Do you see that?
	24 expense, was it for company's expense, I could say that.		24 A Yes, I do.
14:39:17	25 But sitting here eight years, nine years afterwards,	14:42:47	25 Q Who -- is this a list that you compiled?

Page 154

14:42:49 1 A No.
 2 Q Okay. Who did?
 3 A This was distributed in that meeting.
 4 Q Do you know who distributed it?
 14:42:55 5 A I -- I think it was -- it came from David.
 6 Q Okay. Now, do you have -- do you have an
 7 understanding of what the reference to entities to be
 8 added is? What that refers to?
 9 A No.
 14:43:14 10 Q Okay. So there is a list of entities and there
 11 are 14 of them listed. And then underneath that it
 12 says, "entities to be added."
 13 A No, I don't know. What -- what was the
 14 difference between list of entities and list of entities
 14:43:26 15 to be added.
 16 Q Okay. Now, the specific documents that follow
 17 the list, do you know who created these documents?
 18 A Yes. They were made by this -- and there was a
 19 guy named Jeff Solomon. Jeff Solomon was the attorney.
 14:43:47 20 And I believe, if I'm not mistaken, he was in that
 21 meeting. And he was the one who was putting together
 22 all -- they had this in-house counsel, if you will. And
 23 he was the one who was putting all these things
 24 together.
 14:44:02 25 Q Okay. So he was an attorney for Mr. Bergstein

Page 156

14:45:15 1 Media?
 2 A That is correct. All those three entities
 3 became subsidiary of the K.Jam Media.
 4 Q They became subsidiaries sometime after this
 14:45:24 5 date?
 6 A Yes.
 7 Q And you made that happen?
 8 A I made that happen. I -- I made the
 9 election -- the -- the companies were formed. I asked
 14:45:30 10 government. I asked IRS to consider them as the
 11 subsidiary of K.Jam Media.
 12 Q Okay. How about No. 7 on the top list, there's
 13 a reference there to Integrated Administration?
 14 A Yes. Including that.
 14:45:43 15 Q And it says, "It's a wholly owned sub of K.Jam
 16 Media, Inc."
 17 A That is correct.
 18 Q So like those other three entities --
 19 A That's --
 14:45:53 20 Q Let me just finish.
 21 Like the other three entities that became a
 22 wholly owned subsidiary of K.Jam Media, Inc.?
 23 A That is true.
 24 Q Okay. And there's a reference -- No. 13 is to
 14:46:03 25 Swartz IP Services Group, Inc.

Page 155

14:44:05 1 and Mr. Jam?
 2 A Uh-huh.
 3 Q Okay. And he was helping them compile this
 4 information for their businesses?
 14:44:13 5 A That is correct.
 6 Q Okay.
 7 A He was doing the legal part of forming this
 8 entities and --
 9 Q Okay. Now, let me just ask you. On the second
 14:44:29 10 page of the document, there is a reference to K.Jam
 11 Media, Inc., and next to that it says, "Wholly owned by
 12 Kia."
 13 So is that accurate that K.Jam Media, Inc. is
 14 wholly owned by Mr. Jam?
 14:44:43 15 A That is correct.
 16 Q And the next one, KJ -- KJMI Holdings, Inc.
 17 states, "It's a wholly owned subsidiary KJ Media, Inc."
 18 Do you see that?
 19 A And that's -- that's -- that's was their plan.
 14:44:53 20 And that's why I was making reference in this e-mail
 21 that if these are correct, I have to make an election
 22 with the IRS in terms of considering them as the
 23 subsidiary of the K.Jam Media.
 24 Q Okay. So was that, in fact, correct that KJMI
 14:45:12 25 Holdings, Inc. was wholly owned subsidiary of K.Jam

Page 157

14:46:05 1 Do you see that?
 2 A Yes.
 3 Q There's a reference there to Jerry Swartz?
 4 A Uh-huh.
 14:46:10 5 Q And you don't know who that is?
 6 A Never met. Never knew.
 7 Q How about Owari Opus entity?
 8 A Which one?
 9 Q Next to Mr. Swartz's name.
 14:46:19 10 A No. No. 11 is that entity.
 11 Q Okay. And next to No. 11 which states Owari
 12 Opus, Inc. it says "TBD."
 13 So that's to be determined?
 14 A I suppose.
 14:46:32 15 Q And did you understand that to mean that the
 16 owners or -- of -- of that entity would be decided at a
 17 later date?
 18 A These are not my entities. So I was less
 19 concerned about them. I did not concern myself with any
 14:46:49 20 of them.
 21 Q They weren't your entities in the sense that
 22 you weren't the financial advisor accountant for that?
 23 A I was not their accountant.
 24 Q You weren't their accountant?
 14:46:58 25 A I wasn't their accountant.

Page 158

14:47:00 1 Q Okay. Now, No. 12 is Pineboard Holdings, Inc.?
 2 A Uh-huh.
 3 Q Do you see that?
 4 A That is correct.
 14:47:04 5 Q And we saw earlier that you were a signatory on
 6 that bank account?
 7 A That is true.
 8 Q Okay. But it's your testimony that you weren't
 9 providing account- -- accounting services for Pineboard
 14:47:15 10 Holdings, Inc.?
 11 A As I said, I believe, if I'm not mistaken for a
 12 short period of time, we were doing it. And then we
 13 passed it onto them.
 14 Q Okay. Do you know what prompted that change?
 14:47:27 15 A Again, it was part of these entities that we
 16 were not involved with accounting for them.
 17 Q Okay. And next to Pineboard Holdings it
 18 states, "Paul Palomar."
 19 Do you see that?
 14:47:35 20 A Which one?
 21 Q Next to Pineboard Holdings is No. 12?
 22 A Uh-huh.
 23 Q It says Paul Palomar.
 24 A Uh-huh.
 14:47:42 25 Q Do you know who Mr. Palomar is?

Page 160

14:48:53 1 A I don't know.
 2 Q Now, at the bottom of this page it says,
 3 "Franchise Tax Annual Report."
 4 A Uh-huh.
 14:49:02 5 Q It says 2010 return was filed on 11/8/2011.
 6 You need to file and pay for 2011?
 7 A Uh-huh.
 8 Q Do you have any idea if that happened?
 9 A I don't know.
 14:49:10 10 Q No.
 11 A No.
 12 Q And that's because you weren't providing
 13 accounting services --
 14 A That is correct.
 14:49:11 15 Q -- for Swartz IP?
 16 A That was not -- that was not my client.
 17 THE REPORTER: One at a time, please.
 18 MR. LATZER: You got to --
 19 THE WITNESS: I'm sorry.
 14:49:15 20 THE REPORTER: You already started jumping on
 21 each other.
 22 MR. LATZER: You have to let me finish.
 23 THE REPORTER: Thank you.
 24 BY MR. LATZER:
 14:49:20 25 Q Was that because you weren't providing

Page 159

14:47:44 1 A No. No.
 2 Q No idea?
 3 A No idea.
 4 Q Arius Libra, Inc.
 14:47:50 5 A Never.
 6 Q Do you know who that -- what that is?
 7 A No.
 8 Q Let me ask you to turn to the page marked 14.
 9 It's Bates Number Jam TT 474 on the bottom right.
 14:48:11 10 A Fourteen?
 11 Q Yeah.
 12 A Okay.
 13 Q And this page concerns Swartz IP Services
 14 Group, Inc.
 14:48:25 15 Do you see that?
 16 A Yes.
 17 Q Okay. Do you re- -- recall reviewing this at
 18 the time that you sent it out?
 19 A No.
 14:48:33 20 Q No.
 21 And is that because this wasn't a company for
 22 which you were providing accounting services?
 23 A That is correct. I didn't care.
 24 Q Okay. Do you know if Mr. Jam, at any point,
 14:48:49 25 had an ownership interest in Owari Opus?

Page 161

14:49:22 1 accounting services for Swartz IP at that time?
 2 A That is correct.
 3 Q Okay. And do you know who was responsible for
 4 that?
 14:49:28 5 A I don't know.
 6 MR. LATZER: Okay. Let's take a short break.
 7 THE VIDEOGRAPHER: The time is 2:49 p.m. We
 8 are now off the record.
 9 (A recess was taken.)
 14:50:29 10 THE VIDEOGRAPHER: We are back on the record.
 11 The time is 3:01 p.m.
 12 BY MR. LATZER:
 13 Q Okay. Let me show you what is marked as
 14 Exhibit 45.
 15:02:06 15 (Exhibit 45 was marked for
 16 identification by the Court Reporter
 17 and is attached hereto.)
 18 BY MR. LATZER:
 19 Q And this is a September 6, 2012 e-mail from
 15:02:25 20 Steve Piskula to Maxine Winton with your copy and
 21 Mr. Jam copy as well.
 22 Do you see that?
 23 A That is correct.
 24 Q Okay. Do you recall receiving this e-mail?
 15:02:38 25 A I must have.

Page 162			Page 164		
15:02:39	1	Q Okay. Who is Maxine Winton?	15:04:59	1	account. Okay. So any money come -- come in went to
	2	A Maxine is another my -- employee of ours.		2	any entity and any money was being disbursed. Whoever
	3	Q Okay. Is -- is she a CPA?		3	had the money, they send it off of that. So we were
	4	A No, she's not.		4	caught in the middle trying to make sure that all the
15:02:55	5	Q Okay. So she's someone who's -- who you are	15:05:16	5	monies coming being appropriately allocated to the right
	6	overseeing?		6	entities, so that was the biggest problem that we had.
	7	A That's correct.		7	So inventory, I believe, is making reference to
	8	Q Okay.		8	the gold inventory. And I do recall in several
	9	A She's the head of the bookkeeping department.		9	instances, David had to go and sell gold because they
15:03:06	10	Q At this time, she was the head of the	15:05:43	10	needed cash. So he went out and he sold some golds that
	11	bookkeeping department?		11	he had purchased.
	12	A Always been.		12	Q Okay. Now -- you -- in your response refer to
	13	Q Okay. And so does she currently work for		13	this group of people, so you're referring to
	14	your -- the firm that you're --		14	Mr. Bergstein, Mr. Jam, and the people?
15:03:13	15	A That is correct.	15:06:03	15	A Mostly, I'm referring to David. Okay.
	16	Q Okay. And she worked for ZKCO?		16	Q Okay. But we previously looked at e-mails
	17	A She used to. Now, she --		17	where Mr. Jam is giving you instructions.
	18	Q She came over with you?		18	A That is correct.
	19	A That is correct.		19	Q And Mr. Bergstein wasn't copied on those
15:03:22	20	Q Okay. And the subject of this e-mail is IA	15:06:16	20	e-mails?
	21	transaction and Mr. Piskula writes, "A deposit was made		21	A That is correct.
	22	into Integrated Administration in the amount of \$80,000		22	Q Okay.
	23	from Swartz IP Services Group, Inc. for in-" --		23	A David is rarely was copied on the e-mails and
	24	"inventory sales. Thanks. Steve Piskula."		24	David is rarely communicated with us.
15:03:38	25	Do you see that?	15:06:23	25	Q Because Mr. Jam communicated with you directly?
Page 163			Page 165		
15:03:39	1	A That's correct.	15:06:25	1	A Yes. That is correct.
	2	Q Okay. Well, let me ask you this first.		2	Q And he ensured that these transfers happened?
	3	Who is Mr. Piskula?		3	A That is correct.
	4	A Steve Piskula was somebody who was working for		4	Q Okay. So it's your testimony that Integrated
15:03:51	5	David in their organization and close proximity with	15:06:35	5	Administration never provided any inventory sales?
	6	Frymi who was the -- David's assistant.		6	A No. Integrated Administration was a payroll
	7	Q Okay. So Mr. Piskula was working for		7	company. They didn't have -- they didn't have the
	8	Mr. Bergstein?		8	inventory to sell.
	9	A I believe that's what my understanding.		9	Q Okay. So did you take any steps at this time
15:04:10	10	Q And do you know what his specific role was?	15:06:57	10	in -- or in or around September 2012 to correct this
	11	A No.		11	error?
	12	Q Okay. And do you understand that this		12	A Well, absolutely. That's -- that's what we do
	13	referenced to an \$80,000 payment corresponds to one of		13	every day. Just because they say this is such and such,
	14	the bank records that we looked at before?		14	we had to ask follow-up question, who was the inventory,
15:04:26	15	A It should be.	15:07:15	15	who -- who bought it, who sold it, where was it.
	16	Q Okay. And is your understanding from this		16	Because if there was an inventory, we should have had
	17	e-mail that Integrated Administration was receiving this		17	control over that. But we never had. There was -- I do
	18	money in exchange for providing inventory sales?		18	recall that in one of the books, I don't know which one
	19	A That's correct.		19	of the books, we were carrying some inventory of -- some
15:04:42	20	Q Okay. Did Integrated Administration, in fact,	15:07:35	20	inventory. And we were told they were gold, okay. But
	21	provide inventory sales to Swartz IP Services Group?		21	they never gave us the details of how many ounces, what
	22	A No.		22	it was, who was holding it, when it was sold, what
	23	Q No.		23	happened to it.
	24	A As I said, they -- this group of people had no		24	Q Okay. So --
15:04:54	25	understanding about whose money should go to which	15:07:53	25	A And then when -- when he is saying this, this

Page 166		Page 168	
15:07:55	1 is a message from David. Steve Piskula is conveying to 2 us that we sold \$80,000 inventory to Swartz. Book it. 3 That's all. It was up to us to ask the follow-up 4 question in order to book it properly.	15:10:11	1 company." And then it serves all these five entities. 2 So it pays the payroll, and this entity pay the payroll 3 company for the amount of wages, taxes, and a portion of 4 the -- the services.
15:08:14	5 Q Do you recall asking the follow-up questions? 6 A We must have. We must have. 7 Q You must have? 8 A We must have. 9 Q Do you recall doing it?	15:10:33	5 Q Okay. So did Integrated Administra- -- 6 Administration make any revenue? 7 A I -- I believe they -- they did some revenue. 8 Of course, they did have revenue. It -- it could have 9 happened to expense, expense, expense.
15:08:21	10 A We must have. 11 Q You're saying it would have been part of your 12 practice? 13 A Of course, because, again, IA did not have 14 inventory. Okay. IA was not in the business of selling 15 gold or anything. So this would not have made sense so 16 we -- we must have had a follow-up question. 17 Q Okay. Do you recall whether you responded to 18 this e-mail? 19 A I don't remember eight years ago if we did	15:10:47	10 Q Okay. And so I believe that your testimony 11 before was that it was only providing payroll services 12 for entities with which Mr. Bergstein or Mr. Jam was 13 affiliated? 14 A That's not Mr. Jam. Mr. Bergstein.
15:08:30	20 but -- 21 Q Now, if there were response to this e-mail, 22 that is something you would have turned over to the 23 government? 24 A Absolutely. If there was any e-mail, okay, 15:08:50 25 every single e-mail. Okay. I never deleted any e-mails	15:11:04	15 Q Okay. But at least for some point in time, 16 Mr. Jam was receiving a salary from Integrated 17 Administration? 18 A Again, there is a difference between an 19 employee and an employer. Okay. So the employers where 20 Mr. Bergstein companies. Employee was Mr. Jam.
		15:11:20	20 Q I understand. 21 Now, is it your understanding that 22 Mr. Bergstein was receiving a salary from -- 23 A That is correct. 15:11:28 25 Q Just let me finish.

Page 167		Page 169	
15:08:56	1 of our system. So if there was any, it was turned over 2 to the government. 3 Q Okay. Do you recall whether you had a verbal 4 communication with Mr. Piskula about this so-called 15:09:10 5 inventory sales? 6 A No, I don't. 7 Q How about with Mr. Jam? 8 A I don't. Maxine perhaps would have called or 9 Ray Shahab would have called and asked question. 15:09:22 10 Q Okay. Is there a reason why Mr. Shahab is not 11 copied on this e-mail? 12 A Nothing in -- in particular. 13 Q Okay. So you said before that Integrated 14 Administration was not in the business of providing 15:09:34 15 inventory sales? 16 A That is correct. 17 Q Okay. They were -- and what type of business? 18 A Payroll company. 19 Q Payroll company. 15:09:45 20 Okay. So explain to me that business model. 21 A There are companies that they do nothing, but 22 they run payroll for different entities, okay. So let's 23 say, I have five different companies. Instead of 24 setting up five different payroll for all five of them, 15:10:07 25 I set up a company and I say, "This is my payroll	15:11:29	1 Was -- is it your understanding that 2 Mr. Bergstein was receiving a salary from Integrated 3 Administration? 4 A That is correct. 15:11:35 5 Q Okay. Do you know what services that 6 Mr. Bergstein was providing Integrated Administration? 7 A No, I don't. 8 Q Do you know if with respect to the employers 9 for whom you say Integrated was providing payroll 10 services, was there any sort of written documentation 11 that concerned the arrangements between these employers 12 and Integrated? 13 A If there were one, we -- we were not aware of 14 that. 15:12:05 15 Q You've never seen that? 16 A No, I never saw that. 17 Q And is that something that you would have 18 wanted to see in order to -- well, strike that. 19 You handled the books and records for 15:12:31 20 Integrated Administration; right? 21 A That is correct. 22 Q Okay. And as part of handling those books and 23 records, you never saw any written agreement between IA 24 and an employer for whom IA was purportedly providing 15:12:50 25 payroll services?

Page 170		Page 172	
15:12:51	1 A That is correct. I -- I don't recall seeing	15:15:21	1 payments that were rapidly coming in -- in and out of
	2 anything.	2	Integrated account -- Integrated's account had nothing
	3 Q Do you recall ever seeing a single document	3	to do with IA's reported payroll business?
	4 which evidenced that, in fact, Integrated Administration	4	A Yes. I was very concerned about that. That's
15:13:02	5 was providing payroll services to an employer?	15:15:34	5 why we called Kia to clarify as to why these funds --
	6 A IA was the payroll company. Their job was to	6	these monies are coming and when or how IA is going to
	7 produce the payroll reports, and pay the -- pay	7	build this entities. Okay. And if I am not mistaken, I
	8 employees and cut the checks and do the -- what ADP	8	do recall that we received some invoices that David
	9 does. Period.	9	generated himself for payroll of these entities being
15:13:27	10 Q Okay. You said you referred in your testimony	15:16:03	10 issued by IA for reimbursement of the fund from them.
	11 to payroll reports?	11	Q Okay. So you -- you've referenced this
	12 A Yeah.	12	discussion that you had with Mr. Jam regarding all these
	13 Q Okay. Did IA produce payroll reports?	13	monies?
	14 A Of course.	14	A That is correct.
15:13:37	15 Q Okay. And you've seen those?	15:16:14	15 Q But was after the fact that was -- remind me
	16 A Of course.	16	when that was.
	17 Q Okay. And those payroll reports concerned	17	A As I said, because of this chaos and the amount
	18 purported employees of entities affiliated with	18	of transaction that was happening and uncertainty as to
	19 Mr. Bergstein?	19	who's company is this, who -- who is going to be
15:13:52	20 A That is correct. Although in those reports, it	15:16:31	20 responsible for that. So we did not have a very good
	21 was not shown as this employee was working for this	21	understanding of all these incoming funds and all those
	22 company or second employee was working for company B.	22	outgoing funds.
	23 And third company was working with company C. They were	23	So therefore, at one point of time, when we
	24 all being reported as one entity. That's the purpose of	24	were late to file the tax return, I put my foot down and
15:14:11	25 it. But when we were allocating that, it would say	15:16:50	25 I said, "You" -- "you guys need to read these and
Page 171		Page 173	
15:14:14	1 Employee No. 1, 5, and 7 is for company A. Employee	15:16:56	1 identify the source of this income or funds and tell us
	2 No. 2, 4, 6 is for company number B, and so forth and so	2	what to do with them." And then I sent it to both Kia
	3 on.	3	and David. They reviewed that and I do recall that Kia
	4 Q Okay. And with respect to Mr. Jam, you	4	came to our office, and we spent an afternoon or the
15:14:28	5 testified before that at least for some period of time,	15:17:14	5 whole day when -- going over those. And then based on
	6 he received a salary for Integrated Administration?	6	that, we finalized our financial statement and then we
	7 A That is correct.	7	file tax return.
	8 Q Okay. It -- was that reported on Mr. Jam's	8	Q I'll show you what I'm marking now as
	9 personal income?	9	Exhibit 46.
15:14:37	10 A Of course.	15:17:46	10 (Exhibit 46 was marked for
	11 Q On his personal tax return?	11	identification by the Court Reporter
	12 A Of course.	12	and is attached hereto.)
	13 Q Okay. Now, we looked before at bank statements	13	BY MR. LATZER:
	14 for Integrated Administration; correct?	14	Q And Exhibit 46 consist of e-mails exchanged
15:14:51	15 A That is correct.	15:17:59	15 between you and Mr. Jam on December 6, 2013?
	16 Q And we saw a substantial sums of money coming	16	A Uh-huh.
	17 in and that -- that account over a very short period of	17	Q Do you see that?
	18 time; correct?	18	A Of course.
	19 A That's correct.	19	Q Now, the bottom e-mail on the first page, the
15:15:01	20 Q Okay. Now, at that time, you understood based	15:18:18	20 greeting is Majid John.
	21 on the fact that you were the accountant for Integrated	21	Do you see that?
	22 Administration that it was in the payroll services	22	A That is correct.
	23 industry as you described today?	23	Q Okay. What is the reference there to John?
	24 A That is true.	24	A John means dear in Farsi.
15:15:15	25 Q Okay. Were you at all concerned that these	15:18:28	25 Q Dear?

Page 174

15:18:29 1 A Dear.
 2 Q Okay. So that was a term of endearment that
 3 you were using?
 4 A Yeah. We call each other -- I call him Kia
 15:18:34 5 John, he calls me Majid John.
 6 Q Okay. And that's how he -- I'm sorry. That's
 7 how you responded. You wrote "Kia John"?
 8 A At the end of today, I may call you Steve John.
 9 Okay. I don't know what's your --
 15:18:45 10 Q Oh, my first name is Eric --
 11 A Eric John.
 12 Q -- so if you're going to put John --
 13 A Okay.
 14 Q -- you're going to say Eric first.
 15:18:48 15 A That is correct.
 16 Q I don't think you're going to say that but --
 17 A No, I will.
 18 Q Okay. So do you recall receiving this e-mail
 19 from Mr. Jam in December -- December 6, 2013?
 15:19:05 20 A I do see this. I'm -- I'm sure I must have.
 21 Q And Mr. Jam writes the second line of this
 22 e-mail, "There's a wire in the Pineboard. It is for the
 23 purchase distribution."
 24 Do you see that?
 15:19:21 25 A Uh-huh.

Page 176

15:20:38 1 Q Okay. So you were booking them, but you were
 2 doing more than that. You were also facilitating the
 3 transactions; is that correct?
 4 A What -- what facilitation you referred to?
 15:20:49 5 Q Well, let me ask you about this specifically,
 6 the December 6th, 2013 ones.
 7 Mr. Jam writes, "Please do the following from
 8 Pineboard Holdings, and the instructions to make a
 9 \$300,000 wire to Graybox, LLC."
 15:21:02 10 A Uh-huh.
 11 Q Do you see that?
 12 A That's correct.
 13 Q So that's -- that's a wire that --
 14 A That's correct.
 15:21:05 15 Q -- you made happen?
 16 A That is correct.
 17 Q And how about with respect to the next one from
 18 Pineboard \$50,000 transfers to Swartz IP?
 19 A That's correct.
 15:21:13 20 Q Same thing?
 21 A That's correct.
 22 Q Okay. And then how about with respect to the
 23 following transaction on the second page it says, "From
 24 Pineboard transfer \$240,000 to IA?"
 15:21:36 25 A That is correct.

Page 175

15:19:21 1 Q What is that in reference to?
 2 A I don't know.
 3 Q Okay. Did you ever have a discussion with
 4 Mr. Jam about what he meant by "purchase distribution"?
 15:19:35 5 A I must have. Again, in that meeting, these
 6 were the issues that we did not know exactly what they
 7 meant. So when we came together, we tried to clarify
 8 all these.
 9 Q So is it fair to say that your meeting, the one
 15:19:51 10 that you've been referring to, was sometime after
 11 December 6th, 2013?
 12 A Oh, absolutely. It was a year or two after
 13 that.
 14 Q Okay.
 15:20:04 15 A It was very hard to get proper information from
 16 David. Okay.
 17 Q But here you're beyond directly with Mr. Jam?
 18 A Oh, yeah. Because Jam did not know himself.
 19 He had to go as David, and David was not giving him the
 15:20:19 20 right answers. So Kia was giving us a sort of a
 21 runaround, and we were not satisfied with that. So we
 22 were just booking them temporarily. Most of those
 23 transaction were booked in a suspense account. So then
 24 we send a list to them and I said, "You need to tell us
 15:20:37 25 what these are."

Page 177

15:21:36 1 Q That's a tran- -- transfer that you made
 2 happen?
 3 A Uh-huh.
 4 Q And then it says in the IA payroll account it
 15:21:43 5 states, "From IA, please wire 100,000 to Cyrano Group"?
 6 A Cyrano Group.
 7 Q Cyrano Group.
 8 Okay. What's Cyrano Group?
 9 A Cyrano is another David's entity.
 15:21:54 10 Q Okay. And you made that transaction happen?
 11 A I must have.
 12 Q Okay. And how about the next one from IA
 13 payroll, which is misspelled, it states, "Please wire
 14 \$28,833.33 cents to FCI Lender Services, Inc."
 15:22:09 15 Do you see that?
 16 A That's correct.
 17 Q Do you know what that is?
 18 A If you look at the bottom, it says, "Property
 19 located at 5353 Round Meadow Road, Hidden Hills." I
 15:22:21 20 think -- I believe -- I'm not 100 percent sure, but I
 21 think that they -- this is -- this might be David's
 22 home, and he must have been refinancing something and
 23 this is a lender. So he was asking me to wire the fund
 24 to --
 15:22:39 25 Q Okay.

Page 178			Page 180		
15:22:39	1	A -- the lender.	15:24:50	1	that at the time that these transfers were happening?
	2	Q And that's a wire that you made happen?		2	A Again, the issue is this was -- so many
	3	A If it was asked me to do it, must have		3	transaction was happening all at once. Okay. And we
	4	happened.		4	were not getting the proper answer as to what are these
15:22:46	5	Q Okay. And how about the last one. Well, two	15:25:05	5	monies that are coming in. And nobody could tell us
	6	transactions from IA, "Please transfer \$100,000 to KJM."		6	except David and David was not accessible to us. And so
	7	That's K.Jam Media?		7	we had to post our question to Kia, and Kia was
	8	A That's correct.		8	deferring it. David is busy. David is on vacation.
	9	Q That's Mr. Jam's company?		9	David is in trial. David is this and that. So
15:22:59	10	A That's correct.	15:25:26	10	therefore, it was being delayed and delayed and delayed.
	11	Q Okay. And it says from KJM, "Please wire		11	Q Okay. But you kept transferring the monies in
	12	20,000 to After Dark Films."		12	the meantime?
	13	Do you see that?		13	A Yes. These were the daily transaction that
	14	A That's correct.		14	were coming in and going out.
15:23:06	15	Q What's After Dark Films?	15:25:50	15	Q Now, during the years that these transfers from
	16	A After Dark Films is another entity that K.Jam		16	Integrated Administration were happening specifically in
	17	Production or K.Jam Media deals with.		17	to 2011, '12, and '13, did you file any tax returns on
	18	Q Okay. So this is with respect to Mr. Jam's		18	Integrated's behalf?
	19	production business?		19	A Integrated was part of the K.Jam Media. Yes,
15:23:19	20	A That's correct.	15:26:07	20	we have.
	21	Q Okay. So that's a payment that benefited		21	Q Okay. So in 2011, you filed a tax return on
	22	Mr. Jam, personally?		22	behalf of K.Jam Media, and your position is that that
	23	A Not -- not necessarily. Not necessarily.		23	was sufficient in terms of the tax file and requirements
	24	Because if Jam provided some service to After Dark, this		24	for Integrated Administration?
15:23:36	25	could be the payment for that.	15:26:25	25	A That's correct.
Page 179			Page 181		
15:23:38	1	Q What service did he provide to After Dark?	15:26:26	1	Q And the same for 2012?
	2	A I'm not 100 percent sure of what was it. But		2	A That is correct.
	3	I -- I knew that Kia was facilit- -- and After Dark was		3	Q And the same for 2013?
	4	another production company, and Kia was providing some		4	A For any year that we filed tax return.
15:23:54	5	services to them.	15:26:31	5	Q Okay. Did you file those by the April deadline
	6	Q Okay. And then finally at the bottom it says,		6	for each year?
	7	"From KJM wire \$25,000 to Jeremy Ferris."		7	A No. As we said, I -- I think '11 and '12 were
	8	Do you know who Mr. Ferris is?		8	delayed and we filed them either in 2013 or in 2014.
	9	A It's a friend of Kia.		9	Q Okay. And did you seek an extension?
15:24:07	10	Q Okay. And do you know why Mr. Jam would want	15:26:50	10	A There are -- government gives you extension for
	11	\$25,000 transfer to him?		11	six months. Okay. So what I do is in this instances, I
	12	A Because he borrowed from him.		12	file tax return with zero information and I attach a
	13	Q He borrowed money from him?		13	statement. I say the client information is not
	14	A Uh-huh.		14	available at this time. And when it becomes available,
15:24:16	15	Q Okay. So these are wire transfers that you	15:27:09	15	I file an amended return. And that's exactly what we
	16	processed for Mr. Jam?		16	did.
	17	A Uh-huh.		17	Q That's what you did for K.Jam Media?
	18	Q And the wires were effectuated?		18	A I'm sorry?
	19	A Perhaps.		19	Q That's what you did for K.Jam Media?
15:24:29	20	Q Okay. So it was sometime after these transfers	15:27:17	20	A That is correct.
	21	were effectuated that you testified that you sat down		21	Q Okay. And let me show you what I'm marking as
	22	with Mr. Jam and Mr. Bergstein and discussed these sorts		22	Exhibit 47.
	23	of transactions?		23	(Exhibit 47 was marked for
	24	A I did not sit with David. I sat with Kia.		24	identification by the Court Reporter
15:24:48	25	Q Okay. Is there any reason why you didn't do	15:27:39	25	and is attached hereto.)

Page 182		Page 184	
15:27:40	1 BY MR. LATZER:	15:30:18	1 that.
	2 Q And this is a Certification of Lack of Record		2 Let's me start from the start. From the
	3 for Swartz IP Services Group, Inc.?		3 beginning. "As of December 27th, 2017, the Internal
	4 A Uh-huh.		4 Revenue Service shows no returns filed for the following
15:27:59	5 Q Do you know what this document is?	15:30:27	5 periods for the business until you described above. And
	6 MR. MIGLER: Oh, can I -- can I have a copy?		6 it list the period as December 31st, 2011 through
	7 MR. LATZER: I'm sorry, yeah.		7 December 31st, 2016."
	8 THE WITNESS: No.		8 Do you see that?
	9 BY MR. LATZER:		9 A I do.
15:28:15	10 Q So about halfway down the page, it states -- my	15:30:38	10 Q Now, this is with respect to Pineboard
	11 copy is a little difficult to read. But I believe it		11 Holdings, Inc.; right?
	12 states, "As of February 16, 2018, the international --		12 A It looks like it.
	13 or Internal Revenue Service shows no returns filed for		13 Q Okay. And that's a company for which you were
	14 the following periods for the business entity described		14 the signatory on the bank account?
15:28:38	15 above. And that's a reference to Swartz IP Services	15:30:50	15 A I was.
	16 Group, Inc."		16 Q Okay. But I believe your testimony was that
	17 Do you see that?		17 you didn't provide accounting services for this entity?
	18 A That's true.		18 A That is correct.
	19 Q Okay. And so below that, there is a -- there		19 Q Okay. And is it your understanding from this
15:28:48	20 are various periods listed, December 31st, 2011,	15:31:01	20 document that Pineboard did not file tax returns between
	21 December 31st, 2012, December 31st, 2013, December 31st,		21 December 31st, 2011 and December 31st, 2016?
	22 2014, December 31st, 2015, and December 31st, 2016.		22 A It looks like it.
	23 Do you see those?		23 Q And is it also your understanding that the
	24 A I do.		24 government believed that Pineboard had an obligation to
15:29:05	25 Q Okay. So is it your understanding that Swartz	15:31:16	25 file tax returns for those years?
Page 183		Page 185	
15:29:08	1 IP Services Group, Inc. never filed tax returns for	15:31:19	1 A As I said, if you're doing business in United
	2 those years?		2 States, you are -- you're supposed to file tax return.
	3 A Off of this document, it looks like it.		3 Q Did you ever have a discussion with Mr. Jam
	4 Q Okay. And is it your understanding that the		4 about filing tax returns for Pineboard Holdings?
15:29:19	5 government believed that there is an obligation to file	15:31:32	5 A No.
	6 tax returns in those years for Swartz IP Services Group,		6 Q No.
	7 Inc.?		7 Did you understand that somebody else was
	8 A Any business --		8 taking care of that?
	9 MR. MIGLER: Speculation.		9 A No. It was not my concern.
15:29:26	10 THE WITNESS: Any -- any business that does	15:31:39	10 Q Okay. You weren't concerned notwithstanding
	11 business in United States are supposed to file tax		11 that you were the signatory on the account?
	12 return.		12 A No.
	13 BY MR. LATZER:		13 Q And you knew that Mr. Jam had at least some
	14 Q Okay. Let's look at Exhibit 48.		14 affiliation with this entity?
15:29:56	15 (Exhibit 48 was marked for	15:31:50	15 A Has what?
	16 identification by the Court Reporter		16 Q Some affiliation with this entity?
	17 and is attached hereto.)		17 A Again, these jobs were transferred to their
	18 BY MR. LATZER:		18 in-house accountant, and he had several people behind
	19 Q And Exhibit 48 is another Certification of Lack		19 him to file these tax returns. So I was under the
15:30:06	20 of Record. And this one is from Pineboard Holdings,	15:32:03	20 impression that they are taking care of it.
	21 Inc.		21 Q And who's the in-house accountant are you
	22 Do you see that?		22 referring to?
	23 A I do.		23 A As I said, I -- I don't remember the name of
	24 Q And it states that as of December 27th, 2017,		24 the gentleman. Harry -- Harry Sarkisian, I believe, if
15:30:15	25 the International Internal Revenue Service -- strike	15:32:24	25 I'm not mistaken.

Page 186			Page 188		
15:32:25	1	Q Okay.	15:34:38	1	therefore, you report those under that mother company,
	2	A It was a gentleman that I introduced -- they		2	under the umbrella of K.Jam Media.
	3	were looking for an in-house accountant. I knew this		3	Q Did you ever receive any notices from the
	4	fellow, I introduced him. They hired him. He was there		4	government regarding a failure to file a tax return for
15:32:35	5	for a few years up to the time that they closed.	15:34:53	5	Integrated Administration?
	6	Q Who specifically hired him?		6	A Never.
	7	A I believe Kia hired him. Or David hired him.		7	Q Did Mr. Jam?
	8	Q Okay.		8	A Never.
	9	A But I made the introduction.		9	Q Do you know if any of Mr. Jam's entities
15:32:48	10	Q But he was retained for purposes of Mr. Jam and	15:34:57	10	received such a notice?
	11	Mr. Ber- -- Mr. Bergstein's businesses, is that fair to		11	A Never.
	12	say?		12	Q Okay. Do you know if Mr. Jam or anyone on his
	13	A That is a fair statement.		13	behalf contacted the government to advise them that a
	14	Q Okay. Let's look at -- let's look at		14	tax return for Integrated Administration had been filed
15:33:02	15	Exhibit 49.	15:35:19	15	through K.Jam Media as -- as you described?
	16	(Exhibit 49 was marked for		16	A You don't have to. It is your requirement.
	17	identification by the Court Reporter		17	And when you report it properly, it should be there.
	18	and is attached hereto.)		18	Q Okay.
	19	BY MR. LATZER:		19	A But one page on the -- the K.Jam Media tax
15:33:14	20	Q And Exhibit 49 is a certification of -- of Lack	15:35:33	20	return shows the name of the affiliate. So therefore,
	21	of Record for Integrated Administration. And according		21	you put their name, their federal ID number, and the
	22	this certification, it states that, "As of		22	amount of your ownership.
	23	December 27th, 2017, the Internal Revenue Service shows		23	Q Did you have any discussion with the government
	24	no returns filed for the following period for the		24	when you met with them in the winter or fall of 2017
15:33:35	25	business entity described above."	15:35:47	25	regarding filing tax returns for Integrated
Page 187			Page 189		
15:33:38	1	Do you see that?	15:35:49	1	Administration?
	2	A I do.		2	A We spoke generally about everything, like, what
	3	Q Okay. And this concerns Integrated		3	we do today.
	4	Administration; correct?		4	Q Do you -- do you recall any specific discussion
15:33:45	5	A Correct.	15:35:59	5	about filing tax returns for Integrated Administration?
	6	Q And the government is stating that from 2011 --		6	A I don't recall any specific question about IA,
	7	December 31st, 2011 through December 31st, 2014,		7	but we spoke about everything.
	8	Integrated never filed tax returns?		8	Q Okay. And when you met with the government in
	9	A That's wrong.		9	the fall or winter of 2017, were you represented by an
15:34:05	10	Q Why is that wrong?	15:36:17	10	attorney?
	11	A Because it's included in K.Jam Media.		11	A I was.
	12	Q Okay.		12	Q And who is that attorney?
	13	A So that's why they don't see that's a separate		13	A The -- the name of the person I remember, but I
	14	one.		14	don't remember the name of -- no, I do. I -- my
15:34:14	15	Q Okay. But is that something that the	15:36:28	15	insurance company appointed an attorney named Tim
	16	government would have been aware of from its --		16	Agajanian. Okay. I don't know the name of their firm.
	17	A They should have been.		17	And then since the matter was a criminal matter, he
	18	Q Let me finish.		18	hired another gentleman there named Mark Beck from
	19	Isn't that something that government would have		19	Orrick. Okay. And he had an assistant, so these three
15:34:18	20	been aware of?	15:36:54	20	gentleman were representing.
	21	A They should have been.		21	Q Okay. And when you met with the government
	22	Q Okay. And why should they have been?		22	with your attorney or attorneys, were there any
	23	A Because there is an election you make and under		23	questions that you refused to answer?
	24	that election, we call it QSub. You become a subsidiary		24	A No.
15:34:33	25	of a -- another entity which is a S corporation. And	15:37:02	25	Q Okay. Did you assert the Fifth Amendment for

Page 190		Page 192	
15:37:05	1 any questions?	15:40:22	1 A I -- I -- I even did not discuss this with Kia
	2 A No.		2 Jam about what happened to him. The only thing that I
	3 Q And you're aware that Mr. Bergstein was tried		3 know that he was convicted, he was jailed. That's all.
	4 and convicted with respect to the transactions that		4 Q Okay. And you -- you -- you said, though, that
15:37:23	5 we've been discussing today?	15:40:34	5 you read the indictment concerning Mr. Bergstein?
	6 A I don't know exactly why -- why he's been		6 A Uh-huh.
	7 convicted, but I know that he must have done something		7 Q Okay.
	8 wrong with respect to these entities, Wimbledon and then		8 A It was given to me by my attorneys.
	9 another -- IP Swartz, that sort of thing. Even when I		9 Q Okay. And are you aware that in that
15:37:43	10 read the indictment, I really did not fully understand	15:40:44	10 indictment, there's a reference to a coconspirator?
	11 the scope of his involvement with those entities. Okay.		11 A I don't recall exactly what it was.
	12 So I did not know -- at the time that I was talking		12 Q Okay. Are you aware that the government at
	13 to -- in winter of 2017, Mr. Bergstein was not indicted		13 Mr. Bergstein's trial identified Mr. Jam as Mr. --
	14 then -- no. He was not convicted then. He was		14 Mr. Bergstein's coconspirator?
15:38:08	15 indicted.	15:41:01	15 A I believe I -- that's what -- that's why the
	16 Q Have you spoke to the government after he had		16 reason they asked me to go and testify.
	17 been indicted?		17 Q Because they understood that Mr. Jam was
	18 A No. I never -- well, let me -- let me think.		18 Mr. Bergstein's coconspirator?
	19 I -- I did not talk to government after his conviction.		19 A That is correct.
15:38:23	20 No, I don't think so.	15:41:13	20 Q Okay. Now, you earlier described Mr. Jam as a
	21 Q But was it before it was -- it was after he'd		21 friend of yours; is that correct?
	22 been indicted, though?		22 A Mr. Jam is a friend, is a family, and a client.
	23 A Oh, yes. Many, many times. Many, many times.		23 Q Okay. And so in -- in responding to my
	24 Q What do you mean by "many, many times"?		24 questions today, is it -- was it your intention to help
15:38:38	25 A This has started as I received the subpoena	15:41:36	25 Mr. Jam?
Page 191		Page 193	
15:38:42	1 from an attorney from DOJ on a Friday afternoon back in	15:41:36	1 A No.
	2 June of 2017. And I responded that in a matter of half		2 Q No?
	3 an hour. And he responded, he said, "I've never		3 A My belief is this, I tell the truth, nothing
	4 received any response to a subpoena in half an hour."		4 but the truth, so help me God. I don't care about the
15:39:02	5 But -- then after that, another gentleman showed up. He	15:41:45	5 rest of that. So that's -- that's -- that's what I do.
	6 was the attorney from SEC. And he sent me a subpoena		6 Q Let me just direct you back to Exhibit 49. I
	7 and asked for information. For a period of time, we		7 have one follow-up on that.
	8 were sending those information to him.		8 A Which one, 49?
	9 At this point of time, I did not have any		9 Q Exhibit 49. Yeah.
15:39:21	10 attorney. I did not consult with any attorney and	15:41:58	10 A Sure.
	11 everything was working very fine. Then I received the		11 Q There is an address listed for Integrated
	12 phone call from the same attorney who invited me to go		12 Administration, 2875 Michelle, Suite 300 in Irvine,
	13 to New York. And at that point of time, I spoke with my		13 California?
	14 insurance company. I said, "They are asking me to go		14 A Uh-huh.
15:39:39	15 there for an interview." My -- my insurance company	15:42:08	15 Q Do you know what that address is?
	16 advised me that you do not go. "You ask them to		16 A That's my current address.
	17 subpoena you. And then when they subpoenaed you, we are		17 Q That's your address?
	18 going to assign you an attorney, and then we'll take it		18 A That's correct. All Mr. Jam's entities and
	19 from there." And that's exactly what happened.		19 businesses and invoices, everything comes to my office.
15:40:03	20 Q Okay. And are you aware that during	15:42:20	20 Q Okay. But your testimony is that you never
	21 Mr. Bergstein's criminal trial, the government		21 received a notice from the government regarding a
	22 identified Swartz IP Services Group as the vehicle		22 failure to pay taxes or -- or file a tax return for
	23 through which fraud was perpetrated?		23 Integrated Administration?
	24 A I have no idea. I never heard.		24 A That is correct. Because I have always filed
15:40:22	25 Q Okay.	15:42:30	25 them on time except those two years.

Page 194

15:42:33 1 MR. LATZER: Okay. Let's take a short break.
 2 THE VIDEOGRAPHER: The time is 3:42 p.m. We
 3 are now off the record.
 4 (A recess was taken.)
 15:50:47 5 THE VIDEOGRAPHER: We are back on the record.
 6 The time is 3:50 p.m.
 7 MR. LATZER: Okay. I don't have any further
 8 questions. Thanks for your time.
 9 THE WITNESS: It's my pleasure. Thank you.
 15:51:00 10 MR. MIGLER: So I have no questions to ask to
 11 Mr. Zarrinkelk at this time.
 12 MR. LATZER: So we're all done?
 13 MR. MIGLER: Yeah. All done.
 14 MR. LATZER: Thank you.
 15:51:07 15 THE WITNESS: Thank you.
 16 THE VIDEOGRAPHER: This concludes today's
 17 proceeding in the deposition of Majid Zarrinkelk. Three
 18 DVDs were used.
 19 The time is 3:51 p.m. We are now off the
 15:51:16 20 record.
 21 (The proceedings were concluded
 22 at 3:51 p.m.)
 23 ---o0o---
 24
 25

Page 196

1 I, Sandra Mitchell Name CSR No. 12553, Certified Shorthand
 2 Reporter, hereby certify that:
 3 I am authorized to administer oaths or affirmations.
 4 (Cal. Code of Civ. P. Sec. 2093 (b) and Fed. R. Civ. P. 28(a)).
 5 The foregoing proceedings were taken before me at the
 6 time and place therein set forth, at which time the witness
 7 was duly sworn by me. (Cal. Code Civ. Proc. 2025.330(a),
 8 2025.540(a) and Fed. R. Civ. P. 30(f)(1)).
 9 The foregoing pages contain a full, true and accurate
 10 record of all proceedings and testimony. (Cal. Code Civ.
 11 Proc. 2025.540(a) and Fed. R. Civ. P. 30(f)(1)).
 12 I am not a relative or employee of the parties,
 13 nor financially interested in the action. (Cal. Code Civ.
 14 Proc. 2025.320(a)).
 15 Before completion of the proceedings, review of the
 16 transcript [] was [x] was not requested. If requested,
 17 any changes made by the witness (and provided to the reporter)
 18 during the period allowed, are appended hereto.
 19 (Fed. R. Civ. P. 30(e)).
 20 I declare under penalty of perjury under the laws of
 21 California that the foregoing is true and correct.
 22 Dated this 30th day of March, 2019.
 23 _____
 24 Sandra Mitchell
 25 C.S.R. No. 12553

Page 195

15:51:31 1 STATE OF CALIFORNIA)
 2) ss.
 3 COUNTY OF _____)
 4
 15:51:31 5 I, MAJID ZARRINKELK, say I have read the
 6 foregoing deposition and declare under penalty of perjury
 7 that my answers as indicated are true and correct.
 8
 9
 15:51:31 10 _____
 11 (Date)
 12
 13 _____
 14 (Signature)
 15:51:31 15
 16
 17
 18
 19
 15:51:31 20
 21
 22
 23
 24
 15:51:31 25

A	113:8 137:7,13,16	actual 86:12 87:9	Administration's	83:21 107:7
a- 83:21	143:17 144:12,17	Ad- 70:1	111:20 113:7	120:20 127:24
A-S-T-E-R-I-N-G	144:18,19 146:8	add 60:11 74:8	143:17	142:23 152:3
18:1	147:23,24,25	added 154:8,12,15	administrative	166:19
a.m 2:19 6:2,11	149:8,14 158:6	addition 16:1 61:1	23:6 36:24	agree 73:20,21 86:3
46:4,8	164:1 171:17	additional 57:2	ADP 170:8	92:18 93:7 107:12
ability 80:19 81:25	172:2,2 175:23	90:8 133:11	advance 42:6 103:9	agreement 22:25
able 45:20 48:22	177:4 184:14	139:11	105:2 115:15	23:12 24:1,11
80:13 146:25	185:11	address 14:3 66:8	Advantage 76:4	31:11 32:19,22
abnormal 121:6	account- 158:9	66:11,12,13	advice 109:23	33:2 41:13 60:7
absolute 50:3	Accountancy 4:10	193:11,15,16,17	advise 25:19,25	92:22 116:1
139:23,24	13:11 16:8 20:14	addressed 124:17	188:13	169:23
absolutely 26:16	124:13	administer 196:3	advised 52:20	agreements 23:17
28:14 31:8 39:11	accountant 12:13	Administra- 168:5	191:16	24:5
50:1 97:17 117:2	12:15,18 37:22	Administration 1:8	advisor 20:11	ahead 121:23
150:24 152:7	47:25 56:13 60:16	2:8 4:20 5:12	157:22	126:14
165:12 166:24	60:16 71:4,19,21	36:25 39:21 69:8	advisors 61:8	airplanes 54:5
175:12	157:22,23,24,25	69:20 70:1,8,9,12	Advisory 50:15	AKS 108:16 109:1
abuse 43:21	171:21 185:18,21	70:13 71:6,12,18	114:1,5,12	109:4,7,24
accept 64:8	186:3	72:7,9,13 73:12	affairs 20:21	al 6:16
access 47:10 48:22	accountants 61:8	74:11 75:1,19	affect 132:3	al- 21:15
60:12 64:14,16	accounting 16:3	78:24 79:6 93:12	affidation 26:5	alert 24:18,21,25
67:17 74:5,10	19:6 60:3 71:22	93:22 94:13 95:6	affidavit 26:6	alike 137:20,22
79:15 84:24	83:5,12,22 95:10	95:11,23 96:23	affiliate 188:20	Allen 130:16,20
accessible 180:6	158:9,16 159:22	97:3,4 98:14,17	affiliated 14:8	allocate 71:3
account 4:12,13,15	160:13 161:1	98:24 99:14,25	21:10 22:7 24:6	allocated 164:5
18:25 44:14 51:14	184:17	100:12 101:6,13	39:19 40:4 58:13	allocating 148:18
52:4,19,20,21,25	accounts 19:6,25	101:19 103:14	58:17 60:1 92:13	170:25
60:11,12 62:8	40:17 66:16 67:16	106:18,25 107:15	92:15 103:24	allowed 196:18
64:4,6,11,13,14	74:24 76:14 84:11	108:5,16,22 109:9	104:7,15 123:13	altogether 21:15
64:16 65:12 66:21	85:6 124:21,23	110:23 111:6	168:13 170:18	27:15
67:9 68:2,9 71:15	accuracy 56:18	113:1,18 114:13	affiliation 31:25	amended 181:15
73:6,9 74:3,11,14	57:15 128:12	114:23 115:6,14	35:12 146:15	Amendment
74:17,19,20,22	accurate 155:13	115:23 117:6,11	185:14,16	189:25
76:11,11,19 79:8	196:9	118:10 125:24	affirmations 196:3	American 40:13
79:8,19 80:13,17	acquainted 16:10	126:4,23 138:17	afford 140:23	44:22 45:4 48:4,7
80:18 81:24 82:1	16:17 26:25	148:3 149:17	Aframi- 129:13	116:11 141:6,11
82:5,6,6,7,9,10,17	act 30:5 121:20	150:9,12,17,21,23	Aframian 129:14	141:18 146:9,20
82:21 83:6,8	139:7	151:5,10 153:13	129:25	147:1,2,7,10,14
84:15,18,21,25	acted 96:10 97:14	156:13 162:22	afternoon 173:4	147:16,22,22
85:2,15 86:5,9,16	acting 27:25 29:21	163:17,20 165:5,6	191:1	148:1,24
86:18 87:1,24	29:25 139:6	167:14 168:6,17	afterward 122:5	Amex 46:20 47:11
88:23 89:14,18	140:11	169:3,6,20 170:4	Agajanian 189:16	145:19
92:2 93:1,3,8,9	action 6:9 196:13	171:6,14,22	ago 10:5,9 16:12	amount 22:20
94:12 95:4,19	active 17:11,12	180:16,24 186:21	17:2 18:24 22:9,9	115:4,7 144:13
98:24 111:7,14,20	activities 19:4,22	187:4 188:5,14	32:13 33:15,15	162:22 168:3
	activity 20:24	189:1,5 193:12,23	49:25 50:7 75:21	172:17 188:22

Angeles 2:18 6:1,12 20:22 27:5	76:18 85:16,17 106:24 108:15 120:22,22 181:5	76:2 85:12 88:20 93:19 123:3 135:7 143:6 152:12 161:17 173:12 181:25 183:17 186:18	42:9,16 43:15 44:16 46:7 51:17 53:24 54:10,16 66:20 74:8 75:9 94:3 95:2 97:19 104:13,24 105:3 118:10,19 120:4 120:20,23 121:1 121:17,19 131:3 131:19 132:1 140:3 145:4 161:10 191:1 193:6 194:5	Beck 189:18 beginning 30:16 149:22 184:3 behalf 2:17 26:1 63:11,17,19,23 64:1 86:21 117:18 119:13,17 127:20 180:18,22 188:13 belief 193:3 believe 9:8,16 12:18 23:4,9,22 24:3,7 29:21 30:2 31:15 32:6,25 33:13,17 36:14 40:10 41:22 43:3 43:9,12,15 45:17 48:16,23 49:22 50:19 51:18,23 55:7 56:11 57:17 57:20 69:6 74:14 75:17 87:21 96:14 96:17 102:23 104:24 108:7 114:9 122:13 129:2 139:23 147:22 154:20 158:11 163:9 164:7 168:7,10 177:20 182:11 184:16 185:24 186:7 192:15
annual 21:13,22 66:22 160:3	Arius 159:4	attend 36:4	backup 133:17 134:19,22,24 135:3	believed 183:5 184:24
answer 28:25 52:23 91:19 180:4 189:23	arrangement 24:8 142:3,5	attorney 10:7,17 42:13 110:4 154:19,25 189:10 189:12,15,22 191:1,6,10,10,12 191:18	balance 40:12 129:15,25 144:3	beneficiaries 138:11
answered 5:15 87:16	arrangements 169:11	attorneys 22:22 42:13 90:24,24 189:22 192:8	bank 4:15,17,18,20 18:25 19:5 52:21 60:11,11 61:19 64:4,5,6,16 65:12 65:23 66:15,16,19 66:19,20 67:6,7 68:1,8,9,9 71:15 74:9,11,24 76:11 84:25 85:14,14,20 86:14 88:22 90:12 93:2,22 94:12 109:21 126:3 137:13 144:18 147:24 158:6 163:14 171:13 184:14	beneficiary 109:12 109:12
answers 58:23 99:12 175:20 195:7	arrived 105:1	audit 57:1,2	based 27:23 56:23 57:7,9,21,24 120:8 132:18 171:20 173:5	benefit 39:13 149:13
antiques 47:8 129:21,23	article 66:17 68:7 71:16	audited 131:20	Bartfay 3:21 6:5	benefited 40:11 140:19 141:4,13 148:21 149:9 178:21
any- 38:14 40:11	articles 67:3	August 71:9 93:23 93:24 94:14,15 117:7	Barn 145:22 147:3 147:6 151:17,20 152:2	benefiting 39:9,12 140:18 142:2 149:1
anybody 49:7 63:18 122:16	aside 92:5,9	authority 67:18	be- 35:16	Ber- 186:11
anymore 68:10	asked 31:16 32:9,9 81:13 83:6 87:16 90:17 97:25 103:17 105:9 116:16 119:25 140:12 142:14 143:24 156:9,10 167:9 178:3 191:7 192:16	authorize 63:16 64:14		
ap- 103:6	asking 33:14 42:6 56:13 92:5,24 93:2,6,9 105:12 166:5 177:23 191:14	authorized 49:9 63:18,22 67:16 76:15 77:12 79:2 90:3 196:3		
apparently 103:6 115:21 125:25 129:24 130:19 138:8 139:12 145:1	appear 90:14	authorizes 26:6		
APPEARANCES 3:1	ASPEARANCES 3:1	available 181:14,14		
appearing 8:2	aspects 23:6	aware 26:9 47:20 50:10,14 59:10,16 74:24 93:11 99:13 100:11 101:10 106:5 110:8 119:22 121:7 141:2,5 169:13 187:16,20 190:3 191:20 192:9,12		
appears 13:17 89:10 106:24	assert 189:25	B		
appended 196:18	assessment 134:7	b 4:7 5:2 170:22 171:2 196:4		
application 4:10,12 4:13,15 62:8 73:6 73:9 74:3,14	assets 53:20	B1123 3:15		
apply 68:7	assign 191:18	back 9:24 11:7 22:3 23:19,25 32:13 33:13 41:19,23,24		
appointed 189:15	assist 19:12			
approached 38:12 38:13,19	assistant 163:6 189:19			
appropriately 164:5	associate 44:3			
approval 26:3	associated 9:1			
approximate 22:11	associates 27:7			
approximately 9:10 21:16 22:5 45:23 70:3 93:13 96:12	associating 18:17			
April 41:9 42:4,24	association 35:16			
	assuming 141:21			
	Astering 17:25 18:1,20,21			
	attach 153:12 181:12			
	attached 7:20 13:8 51:19 62:5 69:4			

Bergstein 1:9 2:9 8:23 9:1,20 26:20 26:23,25 27:9,11 27:14,18 28:1,1,5 28:10,12,17 29:6 29:15,24 30:10 31:6,12,23 32:4 32:19,20 33:4,7 33:11,24 34:1,15 34:16 35:2,5,20 35:21 36:3 37:11 38:9,23 39:9,14 39:16,19 40:4,6 40:12,19 41:2,5,7 41:11,14 42:2,25 43:4,9,12 44:6,19 45:10 47:2 48:22 49:5,9,17 53:4,6 53:19 54:19,21 55:14 56:8 58:17 70:16,19 78:7,14 78:15 79:2,18 84:8,20 85:3 87:8 90:6 92:15 104:5 104:7,15,17 105:6 105:24 106:4 111:1,15 120:18 121:9 129:3,6 130:3 138:3,7,8 138:14,15,18 139:2,9,13,17 141:1,19,20 142:3 146:14,22 148:13 148:17 152:16 153:2 154:25 163:8 164:14,19 168:12,14,20,23 169:2,6 170:19 179:22 190:3,13 192:5	better 37:9 beyond 10:20 19:8 35:16 45:19 142:1 175:17 big 46:25 49:20 50:20,24 51:4 54:3 66:25 144:14 144:14 150:14 biggest 164:6 bill 22:21,23 145:19,20 147:1,2 147:7,10 billing 21:13 91:1 bills 21:4 147:3 bit 43:17,20 102:23 black 44:22 46:20 48:13 blank 73:19,22 Board 4:10 13:11 16:8 20:14 124:12 boasted 27:11 Bohemia 145:21 147:3,5 151:13,15 152:2 book 166:2,4 booked 56:16 57:6 59:3 175:23 booking 175:22 176:1 bookkeeping 48:1 57:5 162:9,11 books 124:21,23 150:6 151:22,22 165:18,19 169:19 169:22 borrowed 149:13 179:12,13 borrowing 111:10 boss 28:1,3 43:22 45:13 bottom 95:16 109:18 159:9 160:2 173:19 177:18 179:6 bought 14:11 47:8 129:24 130:1,3 141:2 165:15	Boulevard 2:17 6:12 36:9 boundaries 20:17 branch 85:1 brand-new 18:22 112:23 break 46:3 118:15 161:6 194:1 breakfast 29:11 53:25 breaking 75:4 brief 125:12 briefly 129:22 bring 54:5,6 bringing 56:9 87:12 93:1 122:22 Broadway 91:9,14 92:6,10,14,21 broke 46:19 75:12 brother 16:18 brother's-in-law 16:18 brother's-in-law's 16:19 brother-in-law's 16:21 brought 14:14 44:15 91:2 119:25 build 172:7 building 27:4 bullying 28:10,12 bunch 40:7 47:7 50:20 104:10 bus- 14:14 business 4:12,13,15 11:7 14:14 17:9 18:11,12 19:8 20:20 23:6 25:11 27:6 29:9 30:6,25 31:3,19 40:19 48:11,16 52:12,15 52:17 53:4,14 54:19,22,23,24 55:3,4,5,13,18 59:6 61:12 62:8 65:16 67:25 70:7 70:11 73:6,9 74:2	76:4 80:1 98:2 101:18 105:5 111:2 129:4 130:8 130:9,11 134:13 166:14 167:14,17 167:20 172:3 178:19 182:14 183:8,10,11 184:5 185:1 186:25 businesses 43:7 53:7,19 155:4 186:11 193:19 businessman 122:21 busy 180:8 buy 53:8 129:20 buying 54:3 129:23 129:23 130:6,8,9 130:11	67:22 68:4 140:4 142:6,8 174:5 capacity 47:13 119:13 CAPISTRANO 3:15 Capital 18:1,1,20 18:21 capture 134:15 card 14:14,15 40:13,14 45:1 46:21 47:11 48:4 48:7,13,15,16,22 48:23 49:1,2,6,8 49:10,17,23 50:8 66:13 90:13 141:19 147:10 cards 44:23 141:6 141:12 148:19 care 81:12 159:23 185:8,20 193:4 careful 48:10 132:6 132:7 Carol 101:19 102:10,15,16,21 103:4,5 Carroll 80:8 carrying 165:19 CASCADE 1:9 2:9 case 1:6 2:6 6:14,15 8:22 10:6 24:24 25:3 120:16 121:22 134:2 150:20 cash 103:16 135:24 137:2,4,7,16 164:10 caught 164:4 cause 7:2 caused 47:2 124:3 Cayman 141:1 celebrity 21:3 CENTRAL 1:2 2:2 cents 21:13 177:14 certain 20:19 31:1 48:17 75:13 142:15
--	---	---	--	--

certainly 73:3 106:5,6 120:3 134:23	196:11,13,19 clarify 37:19 172:5 175:7	42:3,17 47:22,24 50:21 52:23 54:13 81:20 89:16 97:6	54:3,4 56:15,15 59:25 65:12 66:25 67:22 68:20 70:14	concluded 194:21 concludes 194:16
certification 5:9,10 5:12 182:2 183:19 186:20,22	Class 1:4 2:4 3:2,7 59:18	116:8,8,19 132:22 146:23 164:1,1	98:17 102:24 110:1 111:1 112:24 118:11	conducted 43:8 conducting 129:4
certified 6:6 12:13 12:14 196:1	clean 46:17 clear 8:8 36:15 69:25 109:13	comes 143:19 193:19	134:8 146:18 150:22,24,24,25 153:21 159:21	confessed 142:17 142:21
certify 196:2	117:19 120:14 147:9	comfortable 121:10,10,13 122:20	165:7 167:18,19 167:25 168:1,3 170:6,22,22,23,23	confirm 93:5 confused 84:14
CGMA 12:15,16	clearly 80:20 83:24	coming 10:19 11:10,15 19:24	171:1,2 172:19 178:9 179:4 184:13 188:1	confusion 128:16 connection 119:2
change 107:24 158:14	client 16:23,25 24:18,21 25:6,11	24:19 29:2,4 40:8 49:20 51:6,11,13 51:15,16,24,24	189:15 191:14,15 company's 37:3 149:8 151:24	conservative 146:7 consider 83:11 156:10
changed 50:15	25:19,24 26:8 31:7,9 56:13	52:7,18,19 53:2 55:22 56:5,7 58:3 58:6,10,20,24	compensation 21:17,20 22:5,18 40:6	consideration 108:5
changes 196:17	79:15 81:22 97:14 116:10 120:21	61:20 75:13,16,18 77:17 80:20 82:8 98:4,5 107:15	compilation 57:5,6 compile 155:3	considered 132:17 considering 155:22
chaos 172:17	121:9 122:23 124:8 160:16	109:13,14 111:9 111:13 121:16 125:12 126:1	complete 51:21 completion 196:15	consist 173:14 consistent 87:21
chaotic 53:17	181:13 192:22 client's 57:16 142:21	132:2,13 133:10 134:10 138:20 144:21 149:10	compiled 153:25 completes 98:22 99:21 100:16	consolidate 72:15 consolidated 6:14 72:18 96:25
character 30:11,15 43:5,18 44:7,18	clients 21:5,7 22:22 23:7,17 24:24	164:5 171:16 172:1,6 180:5,14	comply 153:25 complete 51:21 completion 196:15	consult 191:10 consulting 130:16 130:20,25
characterization 127:21 128:12 133:6	57:18,25 116:6,7 119:3,13,19,20 121:12 124:9	commencing 2:18 committed 124:3 communicate 125:12	comprehensive 51:21 con- 44:9	contacted 188:13 contain 196:9 Continued 5:1
characterized 133:2,16,21,23	136:12,13 137:4 137:15 153:10	communicated 43:19 164:24,25 communication 42:15 167:4	106:22 108:13 110:11 113:22 115:2 117:4 118:4	continues 145:17 control 25:2 28:13 28:16,17,19,21
charge 34:8 44:14 44:20,25 46:20	close 24:23 163:5 closed 18:7 186:5 clue 56:6 64:2 68:24 79:14 93:8	communicated 43:19 164:24,25 communication 42:15 167:4	con- 44:9 concern 43:16 85:7 145:5 157:19 185:9	controlling 38:24 43:13 45:10 conversation 45:7 45:9
47:2,6 49:13 84:4 84:5 124:20,22 151:12	coconspirator 192:10,14,18 Code 196:4,7,10,13 COLE 3:3,8	communications 140:3 comp- 153:21 companies 31:14 33:21 34:22 37:23	concerned 44:14 45:9 78:17 132:4 133:19 157:19 169:11 170:17 171:25 172:4	convicted 190:4,7 190:14 192:3 conviction 190:19
charged 151:1	collect 131:19 collecting 134:4 Colorado 36:9	167:21,23 168:20 company 17:7 18:22 31:19 32:14 33:12 37:1 52:11	concerning 8:22,24 14:12 192:5 concerns 159:13 187:3	convince 121:11 copied 135:16 136:3,7,11,16 143:9,20,23
charges 45:19 46:1 47:21 49:15,17,19 49:20,23 50:8 141:8,9,18 145:19 145:21 147:5,6	combination 86:7 come 9:24 19:5 32:14 33:8 38:19			
charging 84:3				
chartered 12:14,17				
check 42:22				
checking 76:4 80:2 101:18				
checks 64:17,17 137:11,13 170:8				
China 120:23				
chose 44:3				
circulated 153:7				
circumstances 115:25				
Civ 196:4,4,7,8,10				

152:17 164:19,23 167:11 copy 42:14 48:23 48:24 49:2,6 66:17 73:23,24 90:23,25,25 131:13 143:24 161:20,21 182:6 182:11 corner 94:21 CORP 1:9 2:9 corporation 68:5 187:25 correct 8:4,7,10 9:18 11:5 12:6 13:3,14,16,21 14:6,18,21 15:12 15:14,22 16:22 17:19 19:19,23 20:1,4,6,16,16 21:18 22:24 23:13 23:18 24:9,14,20 25:17 29:7,17 30:13,19 35:13 36:5,11 38:18,25 39:3,7,10 41:25 42:21 46:21,22 47:3,4 48:5 49:11 49:18 51:1 52:16 54:20 62:11,13,14 65:1,6 69:9,11,12 71:9,23,25 72:10 72:10,14 73:7 74:1,12,12,16 75:19 76:12,13,15 76:16,21,25 77:13 78:9,18,22,25 79:3 81:3,8 82:13 84:19 85:5,19 86:19,20,25 88:1 88:11 89:2,12 90:7 95:3,8,12,21 96:19,21,24 97:4 99:1,16 101:11,15 102:11,14 103:12 103:12,15 106:13 107:3,11,16 108:9	108:25 109:10 110:16,24 111:17 111:23 113:12,20 114:21,23 115:17 115:24 117:9,12 118:8,12,14 120:9 120:10 123:12 124:25 125:25 127:2,5 128:23 129:5,9 130:4 133:3,6 134:17,20 136:9,20,23,25 137:19 139:22 140:10 143:9,10 143:17,18 146:1,4 146:11,13 147:8 147:11 148:11,14 155:5,15,21,24 156:2,17 158:4 159:23 160:14 161:2,23 162:7,15 162:19 163:1,19 164:18,21 165:1,3 165:10 167:16 168:24 169:4,21 170:1,20 171:7,14 171:15,18,19 172:14 173:22 174:15 176:3,12 176:14,16,19,21 176:25 177:16 178:8,10,14,20 180:25 181:2,20 184:18 187:4,5 192:19,21 193:18 193:24 195:7 196:21 correctly 13:15 44:25 47:7 52:6 101:22 corresponds 163:13 cos- 12:14 cost 71:3 counsel 6:18 8:5 154:22 County 36:6 58:25	140:2 195:2 couple 28:4 34:2 72:16 89:25 91:2 99:6 course 15:17 24:23 25:21 26:18 27:24 30:1 119:7 139:4 166:13 168:8 170:14,16 171:10 171:12 173:18 court 1:1 2:1 3:9 6:16,24 7:19 13:7 62:4 69:3 76:1 85:11 88:19 93:18 123:2 135:6 140:21 143:5 152:11 161:16 173:11 181:24 183:16 186:17 courtesy 141:20 CPA 9:2 12:15,20 12:22,25 19:8 20:8,17,19 123:18 123:21 162:3 CPAs 15:13 61:8 cre- 49:1 created 53:13 144:16 154:17 creating 18:23 credit 40:13 45:1 48:15,16 49:6 50:8 90:13 115:22 117:6,23,24 141:19 148:19 credited 132:13,15 credits 105:16 crime 122:5 criminal 12:5 121:20,20 122:4 122:11,15 189:17 191:21 crossed 87:11 120:3 crypt- 18:18 cryptocurrency 18:19 CSR 196:1	cultural 116:24 culture 116:14,17 121:5 142:15 current 6:10 18:3 119:6,7,14 193:16 currently 17:3,6 23:3 123:13 162:13 customer 64:25 cut 137:11 170:8 Cyrano 177:5,6,7,8 177:9 <hr/> D <hr/> D 5:1 daily 180:13 DALLAS 3:4 Dark 178:12,15,16 178:24 179:1,3 date 6:10 27:1 40:10 46:1 56:1 59:15 65:18,22 66:1,22 70:5 96:16 115:10 156:5 157:17 195:11 dated 93:23 128:9 152:17 196:22 David 3:14,14 8:23 26:20,25 27:9 29:4,10 30:7 31:23 32:25,25 33:7,18,19,19 34:10 35:2 37:22 38:12 39:16 40:6 42:5 44:4,6,18 49:3 51:23 52:13 52:15 53:6,12 55:4,6,7 56:14 60:16,25 61:2,3,4 61:8 70:16,19,24 70:25 71:1 77:15 77:16,24 105:23 106:1 111:1 120:17 121:9 122:21 129:20 130:7 138:8,15	139:8,24 141:1,9 141:18,19 146:22 150:1,18 153:1 154:5 163:5 164:9 164:15,23,24 166:1 172:8 173:3 175:16,19,19 179:24 180:6,6,8 180:8,9,9 186:7 David's 33:1 37:3 38:11 45:22 52:10 55:3 150:1,24,24 163:6 177:9,21 day 9:13,14 37:8 44:2 52:24 55:7 59:1 103:7 104:8 104:11,22,25 116:25 124:19 125:25 139:15 144:25 165:13 173:5 196:22 days 42:6,10 68:10 92:19 105:23 122:5,12 129:20 deadline 24:19 25:9 26:9 181:5 deal 91:21 dealing 61:15 83:16 142:17 dealings 30:25 deals 178:17 dealt 61:14 91:17 dear 173:24,25 174:1 debts 53:16 dec- 37:25 decade 26:24 27:2 December 5:5,8 88:24,25 89:9 90:21 94:1,2 143:8 153:5 173:15 174:19,19 175:11 176:6 182:20,21,21,21 182:22,22 183:24 184:3,6,7,21,21 186:23 187:7,7
--	--	---	---	--

decency 141:23	38:22 43:4,12	disbursed 149:11	133:17 169:10	143:8,11,20 144:1
decided 36:12 38:9	44:1,10 45:8	164:2	documents 132:1	144:3 145:17
38:11 69:21,25	54:12 67:3 80:25	disbursement 78:8	133:7 152:4,6	152:15,21,24
70:4 90:16 157:16	81:5 94:12 129:2	disbursements	154:16,17	155:20 161:19,24
decision 36:17	171:23 182:14	78:11	doing 21:1 28:14	162:20 163:17
37:25 38:3,11	184:5 186:25	disciplinary 16:7	28:17 32:11 36:1	166:18,21,24,25
decision-making	188:15 192:20	disclosing 142:20	55:20 56:11 57:1	167:11 173:19
30:6	describes 145:6	disconfirm 93:5	57:1,5 60:3,14	174:18,22
declare 195:6	description 4:8 5:4	discovered 53:1	82:23 98:18	e-mails 4:23 42:15
196:20	78:12 80:6,20,23	discuss 35:25 45:18	102:24 120:5,8,11	42:16 124:18
deducting 132:5	80:23 117:19	65:14 192:1	120:21 155:7	125:15 135:10
defend 27:12	details 13:11 150:7	discussed 33:21	158:12 166:9	140:4 143:24
defendant 6:21	165:21	34:3,22 37:8,10	176:2 185:1	164:16,20,23
Defendants 1:10	determined 22:19	99:6 104:4 121:3	DOJ 191:1	166:25 173:14
2:10 3:13	157:13	126:17 127:23	dollar 46:24 115:7	earlier 43:13 69:6
deferring 180:8	developed 97:7	128:21 179:22	dollars 21:12 45:5	104:4 129:3
defraud 122:15	Diehl 14:4,9	discussing 34:6	52:22 54:11 55:22	135:15 140:8
defunct 17:16	difference 154:14	75:13 84:10	58:3,5,6 61:20	144:5 145:13
degrade 28:7	168:18	103:11 190:5	66:23 86:18	158:5 192:20
delayed 134:6	different 12:20	discussion 11:19,23	112:16	early 16:14
180:10,10,10	33:18 47:8 51:15	37:16 44:8 67:19	Don 80:8	easy 83:8 121:11
181:8	53:7 70:17 87:6	68:18 71:10 77:6	doubt 28:14 30:6	effectuated 179:18
deleted 166:25	167:22,23,24	84:7 96:4 127:20	44:18 98:6 122:11	179:21
delinquent 53:15	differently 153:19	128:1 172:12	doubts 128:15	eight 22:9 33:15
53:15	difficult 39:15	175:3 185:3	drafted 41:17	49:25 107:7
dem- 28:7	182:11	188:23 189:4	drink 122:5,6	121:19 127:23
demand 136:7	difficulties 53:9	disposition 11:11	drinking 122:2,2	151:25 152:3
demising 28:7	dipped 144:5	dissolved 18:7	due 96:15 144:21	166:19
department 8:19	145:13	distressed 53:20	144:21,22,23	either 39:18 40:4
48:1 162:9,11	dipping 145:6	distributed 154:3,4	146:21	52:23 78:15 84:8
depending 25:6	direct 62:21 64:18	distribution 174:23	duly 7:7 196:7	111:12 114:20
deposed 8:11,18	94:18,25 99:22	175:4	DVDs 194:18	181:8
9:3 10:6	100:17 101:16	DISTRICT 1:1,2	DWEICHERT@...	ELATZER@CO...
deposit 76:19,22	106:8,23 113:24	2:1,2	3:16	3:11
100:3 113:7	138:21 144:2	document 13:10,18		election 155:21
162:21	193:6	33:1 62:7,15 63:5	E	156:9 187:23,24
deposited 86:18	directly 81:20 82:8	63:8,11,14,15	E 4:7 5:1,2	eLitigation 6:7
87:1 143:16	122:14 164:25	64:19 65:16,25	e-mail 3:5,11,16	Emergent 17:21
deposition 1:16	175:17	67:9 76:7,8 89:3	4:21 5:5,6,7,8	18:15
2:16 4:9 6:11,13	director 33:19	90:10,23 91:5	42:5 90:22 123:5	employed 17:4,6
7:22 10:4,11,20	directors 32:2	128:6 131:11,12	124:15,16,17	employee 6:8 10:6
11:11 46:15	disagree 93:7	152:15 153:21	125:9,22 128:9,20	27:25 119:13
194:17 195:6	disappeared 18:8	155:10 170:3	129:10 134:18	123:9,10 162:2
describe 28:3 39:1	disappointed 43:19	182:5 183:3	135:14,15,20,22	168:19,20 170:21
39:5 80:22	disaster 140:23	184:20	135:23 136:4,6,10	170:22 171:1,1
described 10:1	disburse 78:10	documentation	136:13,16,22	196:12
28:22 30:10 34:4	143:15	97:19 131:19	138:24 139:2,6	employees 14:22

14:25 15:11 37:2 70:25 136:5,12 143:25 150:13 170:8,18 employer 168:19 169:24 170:5 employers 168:19 169:8,11 endearment 174:2 ended 53:14 151:1 engaged 59:7 engagement 22:25 23:10,11,16,21 24:1,5,7,11 31:11 32:19,21,24,24 33:2 60:7 English 18:17 ensure 128:11 ensured 165:2 entail 12:19 70:15 entered 40:19 138:1 entertainment 20:23 entire 120:15 entirely 8:22 85:5 entities 17:10,17,25 18:3,5,6 19:3 20:3 21:10,15 22:6 24:5 25:15 26:17 31:25 32:6,11 33:5,6,16,18 34:4 34:6,8,14,16,16 34:17,21 35:4,8,9 35:12,18,22 36:1 36:13,16,18,21,22 37:5,6,12,20,24 38:13,21 39:18,24 40:3,24 41:6 53:8 53:13 57:12 58:9 58:12,14,16 60:10 69:10 70:17,17,18 70:19,21,24 71:2 71:19 72:17 75:20 75:22 79:14 95:7 102:23 103:23 104:10,10,17	105:21 117:18 124:21,23 137:18 152:25 153:17 154:7,10,12,14,14 155:8 156:2,18,21 157:18,21 158:15 164:6 167:22 168:1,12 170:18 172:7,9 188:9 190:8,11 193:18 entitled 6:15 13:11 150:8,11 entity 17:12,13,16 17:21 23:5 31:18 34:18 35:10,10 36:24 37:1,3,4,7 40:15 50:11 55:8 59:20 60:4 68:6 69:7 92:13,16,17 104:6,14 129:3 146:12 157:7,10 157:16 164:2 168:2 170:24 177:9 178:16 182:14 184:17 185:14,16 186:25 187:25 entries 76:9 128:8 entry 78:20 115:13 Eric 3:8 6:20 174:10,11,14 error 165:11 ESPADA 3:15 especially 20:21 30:6 ESQ 3:3,8,14 established 65:8,19 66:2,6 71:7 89:19 establishing 68:19 establishment 71:11 et 6:16 EUGENE 1:8 2:8 Evan 60:19,20,20 60:21 Evans 14:4,10 everybody's 50:8,8	50:9 evidenced 170:4 evolve 30:17 122:19 exact 46:1 56:1 70:5 74:19 exactly 22:8,22 27:1 55:23 56:16 80:6 104:8 175:6 181:15 190:6 191:19 192:11 EXAMINATION 4:5 7:10 examined 7:8 example 19:10 79:22 120:19 122:1 exchange 84:1 101:14 106:19 124:18 163:18 exchanged 135:11 173:14 excuse 41:4 95:18 101:1,1 Executive 66:9 exhibit 4:9,10,12 4:13,15,17,18,20 4:21,23 5:5,6,7,8 5:9,10,12 7:17,18 13:5,6 61:24 62:3 69:1,2 73:4 75:24 75:25 85:8,10 88:17,18 91:9 93:16,17 122:25 123:1 126:6 135:5 135:10 143:3,4 152:9,10,15 161:14,15 173:9 173:10,14 181:22 181:23 183:14,15 183:19 186:15,16 186:20 193:6,9 exist 18:3 expect 52:20 expecting 152:1 expedite 80:14 expense 127:14	131:5 133:13 148:4 151:24,24 168:9,9,9 expenses 48:5,8,9 48:11,12,18,19 127:12,14 131:7 133:16 135:2 137:8 experience 120:11 experts 91:2 explain 167:20 explore 40:9 Express 40:13 44:22 45:4 48:4,7 141:6,12,18 146:9 146:20 147:1,2,7 147:10,15,16,22 148:1,24 extension 181:9,10 extract 91:3 eye 28:8,8 43:21,21 <hr/> F <hr/> facilit- 179:3 facilitate 102:21 121:13 facilitate- 84:1 facilitated 83:7 86:24 105:17 facilitating 84:1 91:22 151:5 176:2 facilitation 176:4 facilitator 79:16 81:1 82:12,16 83:13 84:23 89:21 102:12 107:9 108:21 110:17,22 119:12,12,18 facility 117:25 fact 40:11 50:10 56:7 60:15 61:21 63:13 64:10 74:10 81:24 105:24 122:9 128:8 134:21 139:9 148:23 149:1 155:24 163:20	170:4 171:21 172:15 facts 57:3 failure 188:4 193:22 fair 53:20 175:9 186:11,13 fall 87:14 188:24 189:9 familiar 26:19,22 42:25 50:11,17 59:20 102:23 familiarity 69:7 family 116:10 192:22 far 20:14 78:16 101:12 Fargo 4:12,14,15 64:5 83:8 84:24 Farsi 173:24 father 142:17,19,21 FBI 8:19 FCI 177:14 February 25:5,8 99:23,24 182:12 Fed 196:4,8,11,19 federal 66:18 68:8 188:21 fee 27:12 42:13 54:2 84:1 110:3,4 110:4 130:20 feeling 120:15 fellow 111:10,11 186:4 felt 56:8 121:9,10 121:13,21 122:20 142:19 Ferris 179:7,8 Fifth 189:25 file 25:14,20,25 26:2,4,4,6,10,14 31:17,20 51:21 57:19,21 58:22 71:24 72:6,12,17 96:7,22 97:2 160:6 172:24 173:7 180:17,23
---	---	---	--	---

181:5,12,15 183:5 183:11 184:20,25 185:2,19 188:4 193:22 filed 51:18,19 57:13 96:14,17 160:5 180:21 181:4,8 182:13 183:1 184:4 186:24 187:8 188:14 193:24 filing 24:19 26:9 65:22 134:5 185:4 188:25 189:5 Films 178:12,15,16 final 56:23 finalized 173:6 finally 179:6 finances 37:12,20 financial 6:8 11:8 19:9,23 20:9,10 20:11,11,24,24 24:25 25:1,4,7 32:8 38:20 39:15 53:9 55:23 56:22 57:8 61:8 72:15 90:12,18,19 111:12 119:1 140:22 157:22 173:6 financially 39:10 39:12 140:18 142:3 196:13 financials 36:1 97:10 150:7 find 28:2 fine 191:11 finish 11:1 21:19 23:14,23 25:22 39:4 40:1 41:4 46:11 54:15 55:15 70:10 92:8 110:20 126:21 139:1 156:20 160:22 168:25 187:18 firm 14:7,11,13,17 14:20 15:1,9 23:5	31:9 40:21 42:18 83:25 86:9 89:11 117:18,21 118:23 119:2,6,7,8,14,25 120:1,7 123:14 124:25 125:16 127:20 162:14 189:16 firm's 128:1 136:8 firms 20:19 first 16:10,25 33:13 34:7,18 43:14 45:11,14 57:19 60:19 67:8 74:21 80:1 81:4 83:3 86:1 87:11 89:5 90:9 93:23 94:1,6 94:13,22 99:23 100:2,17,21 101:17 113:25 117:5 118:22 125:21 138:2 153:14 163:2 173:19 174:10,14 five 78:10 79:21 81:18 83:20 167:23,24,24 168:1 flip 152:18 Floor 2:18 flow 52:2 flying 79:8 focus 29:18 78:19 81:4 focusing 125:20 follow 154:16 follow-up 128:16 165:14 166:3,5,16 193:7 followed 132:24 following 82:7 176:7,23 182:14 184:4 186:24 follows 7:8 foot 172:24 forbid 122:2 force 49:7	forced 140:15 foreclosed 141:22 foregoing 195:6 196:5,9,21 form 68:6 formally 114:5 formed 18:24 34:18,21 36:25 57:10 156:9 forming 60:10 155:7 forte 53:8 forth 42:16 140:3 171:2 196:6 Forty-three 142:25 forward 36:13 68:8 74:7,9 found 122:3,21 four 27:14 29:6,8,9 30:21 78:10 79:21 81:5,17 129:12 Fourteen 159:10 fourth 128:20 frame 23:20,25 54:10,16 55:18 69:23 124:24 125:17,21 Franchise 160:3 fraud 124:3,7 191:23 frequency 112:13 frequent 112:9 frequently 11:7,9 Friday 144:22,23 191:1 friend 149:14 179:9 192:21,22 friends 37:23 68:1 121:4 front 13:10 27:17 27:20 73:5,24 94:11 152:14 Frymi 163:6 full 196:9 fully 190:10 fund 1:4 2:4 3:2,7 6:16 42:23 51:10	56:2 102:4 116:15 117:21,22 149:7 172:10 177:23 funds 19:5,24 21:4 51:6,24 56:3,6,9 58:23 80:13,15 82:1 87:10 111:13 112:2 119:21 127:11 134:1 138:22 139:25 143:15 145:2 148:5,18 149:10 172:5,21,22 173:1 further 91:8 117:23 194:7 <hr/> G <hr/> gain 43:24 48:22 56:4 Gen 80:4,7 general 81:6 137:14 Generale 88:9,13 generally 48:4 133:20 189:2 generate 25:1 generated 172:9 gentleman 26:25 27:18 130:3 185:24 186:2 189:18,20 191:5 gentlemen 34:2 getting 19:13 27:19 67:25 134:4 142:1 149:3,23 150:1,1 150:2,14,19 180:4 give 12:22 25:6 26:5 91:18 105:15 120:18 121:11,25 152:18 given 47:25 94:4 104:8 192:8 gives 181:10 giving 149:12 164:17 175:19,20 glad 34:12 glass 122:4	Global 12:17 17:22 18:15,16 go 22:3 44:11 49:8 50:21,25,25 51:17 54:10,16 83:9 90:15 117:23 121:17,23 151:22 163:25 164:9 175:19 191:12,14 191:16 192:16 God 7:5 122:20 193:4 goes 19:8 32:13 43:15 82:8,9 120:20 going 7:16 11:22 19:13 25:20,25 33:3 34:8 35:25 36:13,15 37:19 40:8 42:9,12 43:7 44:16 45:20,22 51:4,4,6,11,13,24 51:25 52:1,4,15 52:18 53:23 55:2 56:7 58:7 60:13 61:20 80:21 82:11 85:1 88:16 92:2 93:15 94:18 101:22 106:5 111:9,13 120:2 129:21 131:20 132:3,3 133:5,10 138:20 140:3 143:2 148:3 149:11 172:6,19 173:5 174:12,14 174:16 180:14 191:18 gold 129:21,23 130:11 164:8,9 165:20 166:15 golds 164:10 good 6:4 7:12,13 55:19 65:11 75:4 127:9 142:18 172:20 goods 98:15 99:14
---	---	---	---	---

100:12 101:13 106:18 108:5 113:2,18 114:24 govern 119:1 governing 119:23 government 39:1,5 55:24 83:23 87:14 87:19 91:6 97:11 97:12 120:25 122:2 152:6 156:10 166:23 167:2 181:10 183:5 184:24 187:6,16,19 188:4 188:13,23 189:8 189:21 190:16,19 191:21 192:12 193:21 grand 90:16 Graybox 1:8 2:8 6:16 110:13,23,25 111:1,2,7,11 139:13 146:24 148:17 176:9 greeting 173:20 gross 66:22 group 4:17,19 5:9 18:17 50:12 68:1 85:15 88:23 95:19 100:1,22 106:11 111:21 114:6 153:13,14,17 156:25 159:14 162:23 163:21,24 164:13 177:5,6,7 177:8 182:3,16 183:1,6 191:22 grown 140:9 grown-up 30:1,2 140:14 142:16 guess 84:14 gut 120:9,15 guy 44:5 60:16 154:19 guys 11:15 75:3 172:25	H H 4:7 5:2 HACKENSACK 3:10 half 84:4,4 191:2,4 half-million 52:21 halfway 65:18 182:10 hand 7:1 94:3 handle 11:8 20:24 50:7 handled 121:12 169:19 handling 34:8 77:9 77:11,14,16 84:12 84:18,21,23 85:6 98:2 106:1,4 124:20,22 137:4 169:22 happen 67:4 124:5 156:7,8 176:15 177:2,10 178:2 happened 11:24 79:9 96:12 104:1 104:2 122:1 124:1 160:8 165:2,23 168:9 178:4 191:19 192:2 happening 43:6 68:13,15 129:11 134:3,12,14 137:16 140:17 172:18 180:1,3,16 happens 67:21 hard 175:15 Harry 185:24,24 Hassan 15:17 head 162:9,10 headache-free 120:14 Health 80:4,7 81:6 heard 50:13 59:12 59:22 92:17 107:21 120:19 191:24 height 14:23 42:5	help 7:5 19:9 38:20 81:13 192:24 193:4 helped 20:7 140:24 helping 141:20 155:3 hereto 7:20 13:8 62:5 69:4 76:2 85:12 88:20 93:19 123:3 135:7 143:6 152:12 161:17 173:12 181:25 183:17 186:18 196:18 Heritage 148:16 hesitate 116:25 117:2 hesitation 120:25 Hey 45:18 Hi 135:23 Hidden 177:19 high 104:23 Hills 177:19 hired 60:15,16 186:4,6,7,7 189:18 hit 82:5 84:11 85:6 hold 12:9 62:22,24 62:24,24 145:20 holding 153:16 165:22 Holdings 4:15 5:11 59:21 60:7,23 62:12 64:11 65:5 65:8 66:5,9 67:5 67:20 68:16,20 76:5 155:16,25 158:1,10,17,21 176:8 183:20 184:11 185:4 home 19:11 177:22 honest 44:5 56:10 122:20 honestly 18:21 hope 42:9 hour 22:23 84:4,4 191:3,4	hourly 84:3 hours 9:12,22 house 141:22 145:21 147:5,21 147:22,24 148:24 Huh 139:19 hundreds 58:8 I I-N-D-E-X 4:1 IA 39:21 40:15 52:7,19 75:21 78:20,23 102:10 103:3,4,8,21 104:18 109:19 110:13 111:12 112:2,5 125:12,22 126:1 135:24 138:1 146:8,22 149:4,14,15,23 162:20 166:13,14 169:23,24 170:6 170:13 172:6,10 176:24 177:4,5,12 178:6 189:6 IA's 172:3 ID 66:18 68:8 188:21 idea 55:14 59:24 77:2,3 110:1 153:9 159:2,3 160:8 191:24 identification 7:19 13:7 62:4 69:3 76:1 85:11 88:19 93:18 123:2 135:6 143:5 152:11 161:16 173:11 181:24 183:16 186:17 identified 50:22 59:11 62:8 64:25 66:9 191:22 192:13 identify 17:20 51:23 117:25 173:1	illegal 56:12 122:7 imagine 97:9 immediately 103:11 importance 92:22 92:25 imposed 141:21 impression 34:10 53:11 185:20 in- 112:2 162:23 in-house 60:15,16 154:22 185:18,21 186:3 in-person 29:8 incapable 139:17 inclined 133:11 include 139:11 148:12,20 included 187:11 including 15:2 156:14 income 22:20 53:2 59:2 66:23 96:10 125:13 126:2 127:4,7,10,10,13 127:15,18,22 128:4,17,18 132:4 132:7,8,14,23,23 133:2,10,21 134:2 135:1 171:9 173:1 incoming 56:2 102:4 103:3 112:2 132:21 137:8 172:21 incorporate 139:14 incorporation 66:18 67:3 68:7 71:16 increasing 82:4 83:18 indicated 195:7 indicted 190:13,15 190:17,22 indictment 190:10 192:5,10 individual 26:19 64:21
--	--	---	---	--

individually 20:5	71:6,11,18 72:6,9	interpretation	113:19 114:1,5,6	64:25 65:4,7,11
individuals 15:9	72:12 73:11 74:11	127:9	114:12 126:23	67:19 68:19 69:17
20:21	74:20,25 75:19	interrupt 28:6	127:1 131:23	70:22 71:11 77:6
industry 20:23	78:23 79:5 93:11	interview 9:17 10:2	132:9 133:1 141:5	78:7,14,15 79:2
68:22 171:23	93:22 94:13 95:6	90:14,15 191:15	141:11 156:25	79:18 81:13 84:8
information 5:17	95:10,23 96:23	introduce 6:18	159:13 160:15	87:7 90:6 92:12
25:15 57:24 64:7	97:2,4 98:14,16	introduced 60:17	161:1 162:23	96:5 103:23
64:22 65:16 90:19	98:24 99:14,25	186:2,4	163:21 176:18	104:15 105:5,21
125:9 133:12	100:12,22 101:2,6	introduction 186:9	182:3,15 183:1,6	106:3 111:15
134:1,4 142:21	101:12,19 102:20	inventory 129:15	190:9 191:22	117:1,17 119:18
155:4 175:15	103:14 106:17,25	162:24 163:18,21	Iran 122:1	123:6 124:23
181:12,13 191:7,8	107:9,15 108:5,16	164:7,8 165:5,8	irrelevant 84:12	125:9,16 127:3,7
informed 10:19	108:21 109:9	165:14,16,19,20	IRS 19:12 141:23	127:9,20 128:2
137:15	110:19,23 111:5	166:2,14 167:5,15	155:22 156:10	129:4 130:2
informing 139:14	111:20 113:1,7,18	investors 18:18	Irvine 193:12	131:17 135:16
initiate 64:4	114:13,23 115:6	54:6	Island 141:1	136:16,22 137:18
initiating 82:25	115:14,23 117:6	invited 29:15 35:25	issue 9:3 14:12 31:4	137:20,25 139:5
initiator 86:8	117:11 118:9	132:21 191:12	57:8 180:2	139:16 140:8,17
inside 134:12	125:24 126:4,23	invoice 131:13	issued 7:23 172:10	140:19 141:13
instance 24:10	138:17 143:16	invoices 172:8	issues 30:23 175:6	142:2,9,10 143:9
33:11 104:23	146:18 148:2	193:19	items 47:8	143:14,20 144:3
107:8 108:20	149:17 150:9,12	involve 35:21		145:25 146:3,10
117:10 118:9	150:16,21,23	involved 11:22	J	148:4,5,21 149:16
143:13 148:6	151:4,10 153:13	12:2 23:5 27:3,9	J-A-M 145:11	150:8,11 151:4,11
instances 26:8	156:13 162:22	29:4 30:7 33:23	jail 121:19	151:20 152:16
48:18 49:16 91:25	163:17,20 165:4,6	35:10,19,24 36:15	jailed 192:3	153:15,15 155:1
103:16,22 104:5	167:13 168:5,16	36:22,23 38:13	Jam 3:13 6:22 8:25	155:14 159:9,24
112:4 116:18	169:2,6,9,12,20	53:5,6 55:10	9:1 10:16,21,23	161:21 164:14,17
141:10 164:9	170:4 171:6,14,21	60:21 61:11,12,17	10:25 11:3,5	164:25 167:7
181:11	172:2 180:16,19	119:2 121:15	16:11,18,23 17:3	168:12,14,16,20
instinct 120:9	180:24 186:21	142:5,13 158:16	19:16 21:10 22:6	171:4 172:12
instructing 127:3	187:3,8 188:5,14	involvement 36:18	23:1 24:2,13,24	173:15 174:19,21
145:25	188:25 189:5	53:19 81:23	25:11,19,25 26:15	175:4,17,18 176:7
instruction 77:17	193:11,23	146:14 190:11	26:24 27:17,18,25	178:22,24 179:10
77:19,23 78:6,9	Integrated's 172:2	IP 4:17,18 5:9	28:11,13,16,21	179:16,22 185:3
121:16 122:14	180:18	50:12,15,18 52:5	29:10,15,21 30:1	185:13 186:10
131:17 132:18	intent 122:15	55:22 56:5 58:4,5	30:9 33:2,8,24,25	188:7,12 192:2,13
139:9,17 143:15	intention 37:22	58:20 59:6,11,14	34:15 35:5,11,15	192:17,20,22,25
instructions 78:13	192:24	59:17 75:14,16,18	36:3 38:9,10,24	Jam's 9:2 10:16
164:17 176:8	interactions 29:24	75:18 85:15 86:18	39:8,13,14,17	16:20,21 26:17
instructs 26:9	interest 6:9 159:25	87:25 88:22 89:11	40:10 41:24 43:1	34:17 35:9 40:13
insurance 189:15	interested 196:13	92:19 93:13 95:19	43:13,25 44:8	40:16,16 46:20
191:14,15	Internal 182:13	95:22 98:15,19,23	45:8,10,15 47:14	69:10,15 70:21
Integrated 1:8 2:8	183:25 184:3	99:15 100:1,3,13	48:3,14 49:4,5	85:3 95:7 128:12
4:20 5:12 36:24	186:23	100:21 101:1,6,14	53:4 54:19,21	141:6,8,12,19
39:21 69:7,20	international	106:10,19 111:20	58:13,15 59:10,13	144:7 146:12
70:1,7,9,11,13	182:12 183:25	112:4 113:2,8,12	60:1 61:6,7 63:22	150:22,23 171:8

178:9,18 188:9 193:18 JAMES 3:3 Jams 145:9,15,16 145:16 January 5:6 25:5 152:17 153:3,22 Jeff 152:15 154:19 154:19 Jeremy 179:7 Jerome 107:1,10 107:23 Jerry 131:4 157:3 JERSEY 3:10 Jim 6:23 jo" 54:4 job 20:20 56:19,21 170:6 jobs 185:17 John 173:20,23,24 174:5,5,7,8,11,12 JPMorgan 40:14 JUAN 3:15 judged 31:4 judgment 120:16 July 113:24,24,25 114:15,18 115:3,9 jumping 160:20 June 53:22 113:6 191:2 jury 90:16 Justice 8:19 JWALKER@C... 3:5	89:14,14,18 92:20 96:18 97:5 104:18 104:18 109:18,19 111:12 125:14 128:21,24,25 129:1,2,7,8 136:24 155:10,13 155:23,25 156:3 156:11,15,22 178:7,16,17 180:19,22 181:17 181:19 187:11 188:2,15,19 Kashefipour 14:13 15:17,20,21 86:8 keep 22:21 52:11 57:22 125:13 129:10 134:12,16 134:17 137:15 keeping 129:7 kept 144:18 180:11 key 64:21 97:14 Kia 3:13 21:2 27:11 28:4,5,18 32:9,9 32:25 33:8,8 34:10,17,17,17 35:2,9,10,18 36:23 43:18,20 44:3,4,22 45:13 48:14,24 52:12 53:22,24 55:4,6,7 58:24,24 60:10 67:21 74:7,7 77:15,16,24 96:9 98:2 105:12,21 106:5,6 116:2,7,8 116:9,10,19,21 117:2 119:17 121:16 122:14 124:18 125:11 127:9 128:9 130:6 130:7 132:21,22 135:23 136:22 138:21,22,25 139:2,8,23 141:8 141:19,20,21 143:24 146:3,10	149:13,13 150:23 150:25 153:15,15 155:12 172:5 173:2,3 174:4,7 175:20 179:3,4,9 179:24 180:7,7 186:7 192:1 Kia's 28:18 29:11 44:14 49:2 52:12 52:15 55:3 124:21 Kiarash 6:22 kids 138:14 kind 12:12 KJ 155:16,17 KJM 129:11 135:24 136:24 178:6,11 179:7 KJMI 153:15 155:16,24 KJP 135:24 136:21 145:20 146:1,10 146:15 knew 32:2 34:18 35:19 37:4 43:8 47:9 60:12 105:24 106:6 112:10,15 116:19 121:14 131:2 135:2 138:21 145:2 157:6 179:3 185:13 186:3 know 17:3 18:23 26:21 27:21 35:15 44:3,23 47:5 50:3 50:16 51:8 52:24 52:24 55:9 58:7 58:11 59:8,12 63:25 64:10 73:23 74:19 76:8 81:11 81:23 83:21 87:6 87:9 91:17 92:12 92:15 93:2,10 95:22 96:8 98:14 98:16 100:7 101:12 102:16,20 104:8 106:1,6 108:4,9,10 109:24	110:2 111:2,5 112:16 113:14 114:7,8 115:18 116:14 117:13 121:21 123:22,24 127:19 129:19 130:23,24,25 131:7 132:20 136:3 138:9,11,14 138:15 139:14 141:3 144:5 145:11,13,16 147:21 149:20 151:13,15,19,21 152:1 154:4,13,17 157:5 158:14,25 159:6,24 160:1,9 161:3,5 163:10 165:18 169:5,8 174:9 175:2,6,18 177:17 179:8,10 182:5 188:9,12 189:16 190:6,7,12 192:3 193:15 knowledge 35:16 35:17 59:8,15 91:16 92:6,9 known 53:12 114:5	88:21 93:20 118:15,21 123:4 135:8 140:7 142:11,25 143:1,7 152:13 160:18,22 160:24 161:6,12 161:18 173:13 182:1,7,9 183:13 183:18 186:19 194:1,7,12,14 launch 18:18 law 3:14 58:1 laws 196:20 lawsuit 27:10 59:17 lawsuits 27:10 leaves 144:3 145:17 ledger 135:24 137:2,14 Lee 130:16,20,23 left 36:16 37:21 40:12 45:3 64:21 left-hand 65:21 legal 6:6 27:12 54:2 110:3 155:7 legally 26:3 lender 177:14,23 178:1 length 51:10 lent 103:4,13,17,23 104:4,6,9,11,19 105:10 115:21,23 115:25 116:20,22 117:17 let's 18:9 19:10 22:3 24:15 25:8 28:8 46:3 54:10 54:16 73:4 75:5 76:17 78:19 79:23 81:4 85:23 88:2 89:5 91:8 94:8 95:13 98:21 99:20 100:15 102:18 103:1 106:7,21 110:10 111:18 113:5 118:3 125:21 126:11 161:6 167:22
---	--	---	--	--

K

K 52:19
K.Jam 17:7,11,13
17:14,15,18 18:9
24:11 40:8 41:24
51:18 52:9,10,11
52:12,14,19 55:2
55:6 56:8 58:22
69:14,15,17,19
70:1 72:2,3,5,8,15
75:21 82:5,7,9,12
82:22 84:12 89:11

183:14 184:2 186:14,14 194:1 letter 32:24,24 liability 19:12 59:3 141:21 Libra 159:4 license 12:12 16:3 124:2,13 licensed 13:2 licenses 12:10 Licensing 13:11 life 39:14 120:14,15 142:19 light 122:10 limit 44:24 limited 21:2 line 66:21 105:16 115:14,22 117:22 117:23,24 118:1 125:21 128:20 134:18 174:21 link 33:7 linked 33:7 list 32:2 33:16 34:16,22 35:12 36:20 37:5,7 70:25 152:25 153:12,18,25 154:10,14,14,17 156:12 175:24 184:6 listed 67:9 129:12 154:11 182:20 193:11 litigation 11:20,22 litigations 12:1 little 43:20 84:14 91:8 102:23 182:11 lived 120:14 LLC 1:8 2:8 6:16 110:14,25 111:1,7 176:9 LLP 14:4 lo- 35:17 loan 19:14 41:10,13 41:19 42:1,2,11	50:23 59:2 96:10 103:3 115:5,13 117:1,2,14 118:10 128:18,19 132:2 132:10,12,17,23 133:2 151:23 loaned 41:1,5,7 loaning 111:10 117:11 120:17 loans 133:24 134:2 located 177:19 long 9:10 10:5 12:25 60:9 84:11 120:11 122:6 look 66:21 67:8 73:4 74:21 76:17 79:23 88:2 89:5 91:8 95:13 99:20 100:15 102:18 103:1,2 106:21 110:10 111:18 113:5 118:3 125:21 126:7,11 149:3 177:18 183:14 186:14,14 looked 86:4 119:11 126:3 131:23 136:10 148:25 163:14 164:16 171:13 looking 63:5,8 65:21,23 107:6 121:19 122:10 186:3 looks 113:13 183:3 184:12,22 Los 2:18 6:1,12 20:22 27:5 lose 124:4 loses 31:19 lot 11:21,23 46:14 lunch 75:4,8,12 M ma- 19:23 mail 47:24 MAIN 3:4,9	Majid 1:16 2:16 3:17 4:3,9 6:13 7:6,15 13:25 33:8 38:19 42:7 54:3 67:22 71:15 80:15 101:24 103:8 105:14 116:3 118:1 122:3 127:12 147:15,17 173:20 174:5 194:17 195:5 major 35:18 making 18:12 47:20 145:1 155:20 164:7 man 27:17 30:1,2 140:9,14 142:16 142:18,18 manage 19:4 20:21 21:4 37:11 managed 19:21 32:14 38:16 management 12:14 12:17 20:20 57:7 57:10 76:22 77:1 77:25 78:6 134:8 manager 11:8 19:8 25:12 33:19 47:14 65:2,5 managing 23:7 37:20 83:15 150:18 manner 134:5 mansion 141:2 March 1:18 2:19 6:1,10 25:9 93:25 93:25 94:16,16 100:18,18,19,25 101:6,17 106:9,9 196:22 Marj- 18:16 mark 152:8 189:18 marked 7:17,18 13:4,6 62:3 68:25 69:2 75:23,25 85:10 88:16,18 93:17 122:24	123:1 135:5,10 143:2,4 152:10 159:8 161:13,15 173:10 181:23 183:15 186:16 Marketing 17:22 18:15,16 marking 61:23 85:8 93:16 135:4 173:8 181:21 matter 6:15 7:24 8:21 12:5 14:12 149:1 189:17,17 191:2 matters 8:22,24 11:8,24 19:9,9,23 20:8,9,10,11 29:3 30:7 Maxine 161:20 162:1,2 167:8 Meadow 177:19 mean 51:3 60:9 72:3 122:22 131:2 132:15 157:15 190:24 meaning 69:19 101:24 132:17 137:10 means 45:19 68:24 80:11 117:20,21 117:22 173:24 meant 64:14 127:7 175:4,7 Media 17:13,14,15 32:15 38:17 40:8 41:25 51:18 52:9 52:10,12,14,19 55:2,6 56:8 58:22 69:14,16,18 70:2 72:2,4,5,8,16 75:21 82:5,7,9,12 82:22 84:12 89:11 89:14,15,18 92:20 97:5 104:18 109:19 111:12 125:14 128:25 129:1,2,8 136:24	148:17 153:15 155:11,13,17,23 156:1,3,11,16,22 178:7,17 180:19 180:22 181:17,19 187:11 188:2,15 188:19 Media's 96:18 meet 103:17 120:22 meeting 9:11 27:10 27:14 29:9,10,10 33:13,15,21,23 34:23 35:24 36:2 36:4,6,14 37:10 37:19,21 39:16 43:14,15 45:12 51:22 53:21,24,25 54:1,3 58:21 96:6 99:6 132:20 153:1 153:6 154:3,21 175:5,9 meetings 28:4 29:8 memory 50:1,6 mentioned 11:9 40:25 mere 64:6 merged 14:9 message 166:1 met 27:14 29:5,11 34:10 39:2,6 87:14 153:2,4,4 157:6 188:24 189:8,21 Michelle 3:21 6:5 193:12 mid-1990s 16:16 middle 108:14 144:2 164:4 midst 50:19 Migler 6:21,21 8:8 28:23 38:4 139:18 139:20 142:6,8 182:6 183:9 194:10,13 mil- 21:3 million 27:12 40:12 46:20,24 47:6
--	---	--	---	---

49:12 51:7,7 54:2 58:5 86:17 87:2,9 87:24 88:5,8 93:13 112:15,16 140:25 million-dollar 44:14,20,25 140:25 millions 54:11 55:22 58:3,6,8 mind 28:6,14 32:14 57:22 87:11 120:3 127:16 134:12 mine 45:21 mingle 48:11 83:5 minor 38:18 minute 152:18 minutes 84:5,6 misspelled 177:13 misstate 139:21 misstated 139:21 misstates 139:18 mistake 120:17 mistaken 9:8 10:5 29:14 31:22 33:17 34:1,9 41:23 60:2 144:16 153:4 154:20 158:11 172:7 185:25 misunderstanding 37:18 128:15 Mitchell 1:21 2:19 6:17 196:1,24 model 167:20 Monday 11:6,6 121:18 144:23 money 39:23 40:7 41:1,5,10 42:11 46:14 51:11,16 52:19,22 53:2,23 56:5 58:3 75:16 75:18 77:21,24 78:4,5 79:9 80:20 82:8 83:15 84:22 85:3 91:24 99:25 103:5,6,13,18,23 104:4,6,11,11,12	104:16,19 105:1,2 105:3,10,15,19,25 109:13 111:9 112:5 115:21,23 116:1,15,19,20,22 117:1,11,15,17 120:17 132:2,5,9 132:13,21,21 133:10 134:10 139:24 141:11 143:18 144:13,15 146:6,8,17,21,22 148:2 163:18,25 164:1,2,3 171:16 179:13 Monica 2:17 6:12 monies 39:18 40:3 52:2,4 54:11,13 58:9,19 59:1 75:13 77:4,7 78:8 79:7,19 81:20 86:4 88:13 91:23 107:14 112:10 128:12 138:19 141:5 151:6,19 164:5 172:6,13 180:5,11 month 47:23 49:20 49:22 137:5,6,12 monthly 47:10,16 47:19 months 18:24 51:9 90:1 181:11 morning 6:4 7:12 7:13 121:18 135:25 144:7 145:14 mortgage 140:24 mother 188:1 move 125:13 128:21 145:19,25 moved 23:5 movie 18:14 130:14 movies 18:12 multimillionaire 21:3 MZ 101:24 103:3	117:20 118:13 <hr/> N <hr/> N 5:1 Najmadin 13:19,20 13:25 62:25 name 6:5 7:14 13:17 14:1,17 15:15,16,18 28:18 28:18 32:1,16 34:23 40:17 48:13 50:13,15,22 58:11 59:22 60:11,18,19 60:20 62:18 63:9 64:25 67:17 86:9 86:10 89:15 102:22 107:21 141:12 147:10,14 157:9 174:10 185:23 188:20,21 189:13,14,16 196:1 named 26:20,25 60:17 130:19 154:19 189:15,18 narrow 150:3 naturally 133:18 nature 84:9 124:7 necessarily 133:22 133:25 178:23,23 need 20:23 25:2,7 25:16 93:4 105:14 105:18,25 116:11 119:20 132:6,7 142:9,10 144:4 145:12 151:11 153:19 160:6 172:25 175:24 needed 31:17 55:4 96:8 103:5,16 104:11 117:15 131:20 145:3 147:25 164:10 needs 116:15 negotiation 45:4 Nelson 14:3,9 never 16:5,9 26:11	26:12,13 27:19 31:3,4,6,9,11 33:1 33:1 34:12 37:23 38:12,12,19 40:5 44:16 45:1 47:9 54:7,23 59:12,12 60:4 61:14 63:18 63:20,22 64:3 84:7 85:6,22 87:11 89:4 91:17 92:17 107:21 119:25 120:2,19 121:3,9,21 122:20 122:22 139:22 140:19,25 141:3 142:14 149:5,5 150:23,25 157:6,6 159:5 165:5,17,21 166:25 169:15,16 169:23 183:1 187:8 188:6,8,11 190:18 191:3,24 193:20 new 3:10 8:18 9:4 12:3 23:5,5 39:6 119:25 120:1,7 122:1 191:13 nickname 13:25 nine 151:25 152:3 non-equity 14:10 normally 64:3 66:15 87:4,4 128:6,14,17 144:21,25 NORTH 3:9 note 14:15 41:17 90:24 109:11,12 notice 2:20 4:9 7:22 188:10 193:21 notices 188:3 notification 25:7 notwithstanding 185:10 November 4:21,23 14:10 29:14 95:16 123:5 124:15 126:10 128:10	133:1 135:11 137:10,25 num- 144:14 number 4:8 5:4 6:14 15:5 21:25 46:25 66:18 68:8 74:19,20,22 82:3 85:15 110:2 144:14 159:9 171:2 188:21 numbers 50:20,25 51:4 67:9 94:25 <hr/> O <hr/> o0o--- 194:23 oath 9:15,16 oaths 196:3 objecting 139:20 obligation 40:16 72:11 97:2 183:5 184:24 obtained 49:2 57:2 October 9:9 45:6 office 3:14 36:6,7,8 36:10 42:4 55:25 58:25 85:1 90:24 96:9 120:4 134:13 173:4 193:19 oh 23:24 43:14 54:13 66:1 67:25 98:3 102:3 126:14 139:7 174:10 175:12,18 182:6 190:23 okay 7:16 8:2,5,8 8:11,13,17,20,24 9:4,10,13,17,19 9:24 10:8,10,13 10:18,23 11:12,17 12:1,9,12,16,19 12:23 13:2,4,17 13:24 14:2,7,22 14:25 15:8,13,19 16:6,13,15,23,23 16:25 17:3,8,10 17:17,23 18:2,4,9 18:13,20 19:2,15
--	---	--	--	--

19:21 20:7,18 21:1,5,9,14,24 22:3,14,16,25 23:8,19 24:10,15 24:21 25:10,18,23 26:15,19,22 27:23 28:15 29:5,15,18 30:4,14,20,22 31:1,6 32:4,17 33:6,10 34:3,14 34:20,25 35:3,14 36:3,12,17 37:9 37:25 39:8 40:18 40:21 41:1,13 42:24 43:3,11 45:23 46:3,23 47:1,5,10,16,22 48:7,13,15,21,25 49:9,24 50:4,11 50:14,17,24 51:6 51:12 52:1,8,14 53:3,18 54:8 55:10,21 56:17,25 57:12 58:2,12,16 58:19 59:5,10,13 59:20,23,25 60:6 61:1,10,18,23 62:18 63:3,7,10 63:13,22,25 64:10 64:13,18 65:4,7 65:10,15,22 66:5 66:8,14 67:8,15 67:19 68:12,18,25 69:10,13,19,22 70:3,7,15,23 71:2 71:10,17,24 72:1 72:3,8,17 73:4,4 73:14 74:2,10,13 74:17,21,24 75:3 75:17,23 76:10,14 76:17 77:1,3,6,14 77:23 78:4,13,19 78:23 79:1,4,18 79:23 80:13,21,25 81:4,9,15,19 82:12,19 83:1,11 83:17,25 84:7,14	85:20,25 86:17 87:1,13,18,21 88:8,12,16 89:3,5 89:20,24 90:2,5 91:7,21 92:1,12 92:18 93:11,15,15 94:3,8,18 95:2,9 95:13,22 96:4 97:1,6,18 98:7 99:2,9,17,20 101:9,16 102:6,10 102:12,18 103:10 103:13,19,22 104:3,14 105:4,13 105:22 106:3,7,14 106:21 107:4,8,12 107:17 108:1,8,12 108:20 109:1,15 109:24 110:7,10 110:25 111:2,5,15 111:18,24 112:6 112:14,18,20 113:5,14,17,21 114:4,11,15,22 115:1,13,25 116:5 116:13,23 117:17 118:3 119:5,10,22 120:5 121:17 122:3 123:10,13 123:18,23 124:1,5 124:7,14,22 125:2 125:4,6,8,15,19 126:3 127:3,6,19 127:25 128:11,20 129:1,8,10,15,24 130:2,5,13,15 131:4,7,22 132:15 132:22,25 133:4,7 133:15 134:9,24 135:9,14,22 136:10,14,18,21 137:1,3,17,24 138:9,13,16,24 139:5,16 140:4 141:19 142:12,24 143:11,13 144:2 144:10 145:17,25	146:5,8,10,14,17 146:25 147:9,12 147:25 148:2,9 149:2,20 150:3,8 150:21 151:12,15 152:21,23 153:11 153:12,13,15,20 154:2,6,10,16,25 155:3,6,9,24 156:12,24 157:11 158:1,8,14,17 159:12,17,24 161:3,6,13,24 162:1,3,5,8,13,16 162:20 163:2,7,12 163:16,20 164:1 164:12,15,16,22 165:4,9,20,24 166:14,17,24,25 167:3,10,13,17,20 167:22 168:5,10 168:15,19 169:5 169:22 170:10,13 170:15,17 171:4,8 171:13,20,25 172:7,11 173:23 174:2,6,9,13,18 175:3,14,16 176:1 176:22 177:8,10 177:12,25 178:5 178:11,18,21 179:6,10,15,20,25 180:3,11,21 181:5 181:9,11,21 182:19,25 183:4 183:14 184:13,16 184:19 185:10 186:1,8,14 187:3 187:12,15,22 188:12,18 189:8 189:16,19,21,25 190:11 191:20,25 192:4,7,9,12,20 192:23 193:20 194:1,7 old 14:14,15 23:2 once 55:8 180:3	one-man 61:4 ones 36:23 92:2 141:3 176:6 online 68:4 101:18 115:4 open 52:21 64:6 66:15,16 67:22 68:1,9 71:15 84:25,25 opened 18:25 67:7 69:24 opening 64:4 65:11 65:12 operating 78:16 opinion 57:11 141:3 opposite 44:7 Opus 157:7,12 159:25 Orange 36:5 58:25 140:2 order 19:11 25:2,8 25:14 27:12 31:20 50:2 80:14 83:9 89:11 91:2 94:6 131:19 144:6 145:14 166:4 169:18 orders 29:2,3 organization 150:14 163:5 original 66:22 originally 65:19 66:1 originating 81:20 86:13 89:16 originator 89:15 Orrick 189:19 ounces 165:21 outcome 6:9 outgoing 56:2 132:21 137:8 172:22 outrageous 49:15 outside 19:10 20:8 overall 27:14 31:22 31:24 112:15	overseeing 136:18 162:6 Owari 157:7,11 159:25 owed 120:25 130:20 owes 19:12 116:21 owned 33:18 70:1 97:5 155:11,14,17 155:25 156:15,22 owner 35:18,18 55:8 64:21 69:17 69:20 owners 32:2 157:16 ownership 69:22 159:25 188:22 <hr/> P P 196:4,4,8,11,19 p.m 75:6,10 118:16 118:20 161:7,11 194:2,6,19,22 Package 76:4 packet 93:24 94:15 94:19 page 4:4,8 5:4 62:23 63:5,8 64:18 65:15,18,25 67:8 73:14,16 74:22 76:17 85:23 88:4 89:6 91:8 94:22,22,24 95:13 98:21 99:20 101:17 106:7,7,21 108:8,8,12,15 110:10 113:5,6,21 113:23 115:1 117:3 118:3 126:8 126:11,16 135:15 153:15,20 155:10 159:8,13 160:2 173:19 176:23 182:10 188:19 pages 94:6 196:9 Pagoda 153:16 paid 41:19,24 42:1 45:2,2 103:5
---	---	---	--	--

104:13,24,24 144:22,23 148:19 149:3,4,5,5 150:19 151:2 152:1 Palomar 158:18,23 158:25 paper 34:24 papers 153:6 paragraph 145:18 Parasec 68:5 Park 66:10 part 7:25 8:1 25:5 27:2 72:2,3 96:18 96:24 137:25 155:7 158:15 166:11 169:22 180:19 particular 51:14 94:19,25 98:8 107:4 112:24 117:13 127:17 148:6 167:12 parties 6:8 196:12 partner 14:10 16:1 partner's 15:15 partners 15:3,9,10 15:13,23 party 80:19 93:9 PASEO 3:15 passed 158:13 Paul 158:18,23 pay 19:11 21:4 40:15 42:9 44:16 45:20,22 53:23 103:4 121:1 131:12 133:10 140:23 141:6,8,8 141:11 144:16,20 144:24 146:9,25 148:1,5,9 149:8 149:15 151:19 160:6 168:2 170:7 170:7 193:22 pay- 70:22 payable 111:11 132:14,16	paying 27:12 32:5 53:15,16,16 95:23 118:10 133:12 148:3 payment 42:13 45:5 81:5,10 87:24 96:2,5 97:8 98:8 99:3,5 100:21 101:1,5 105:5,7,8 106:24 107:9,14 108:2,15 108:21 109:1,5,8 110:5,13,19,23 111:19,25 113:3 113:11,19,25 114:12,15 115:5 126:19,22 127:1 129:25 131:4,9,14 133:1 140:24 141:17 144:25 163:13 178:21,25 payments 47:20 96:9 100:13 101:10,14 106:10 106:15,19 114:23 131:10,18 132:11 146:21 152:5 172:1 payroll 37:1,2,3 40:14 70:13,16,18 70:21,22,23 98:17 98:18,19 102:24 103:17 125:13 144:6,11,12 145:1 145:6,13 149:4,15 151:2 165:6 167:18,19,22,24 167:25 168:2,2,11 169:9,25 170:5,6 170:7,11,13,17 171:22 172:3,9 177:4,13 payrolls 144:14 pays 168:2 penalty 57:23 195:6 196:20 pending 7:3	penny 140:20 141:4 people 14:24 15:8 20:22 26:13 37:4 61:3,6,7 153:7 163:24 164:13,14 185:18 per- 29:19 percent 22:2 37:7 42:14 51:9 69:17 69:19 89:17 97:5 131:10 136:17 177:20 179:2 percentage 21:9 22:1 perception 45:9 performed 22:6 33:4 period 15:25 29:1 29:19 31:1 39:20 44:24 49:21 51:8 51:10 53:11 60:3 60:9,14 61:16 64:12 70:6 79:20 85:16 88:24 91:1 91:5 93:12 120:1 134:3 149:4,19,20 150:4 158:12 170:9 171:5,17 184:6 186:24 191:7 196:18 periods 182:14,20 184:5 peripheral 17:10 17:17 perjury 57:24 195:6 196:20 permitted 20:13 perpetrated 191:23 Persian 116:12 person 20:24 27:20 27:20 30:24 31:2 43:10 80:17 82:24 98:4,5 130:19 144:1 189:13 personal 40:16 48:4,8,9,10,15,18	48:19 93:2 117:21 118:10 147:14,24 148:1,3,7 149:13 151:23 171:9,11 personally 40:18 42:20 103:13,23 104:5 117:18 141:14 148:21 178:22 perspective 109:7 112:20,21 pertaining 90:6 phone 64:6 120:24 140:4 191:12 Physicians 76:22 77:1,25 78:6 picked 153:17 picture 122:3 piece 34:23 91:5 Pineboard 4:15 5:11 59:21,23 60:5,7,13,23 61:10,12,15 62:12 64:11 65:5,8 66:5 66:9 67:5,20,23 68:13,16,19 76:5 77:3,7,9,11,14,16 78:20 79:5 80:2,6 80:8,9,10 81:6,21 82:2 86:4,13,21 87:10,24 107:13 158:1,9,17,21 174:22 176:8,18 176:24 183:20 184:10,20,24 185:4 Pineboard's 76:10 pinpoint 27:1 Piskula 161:20 162:21,24 163:3,4 163:7 166:1 167:4 place 6:11 109:10 119:1 196:6 placed 13:10 73:5 152:14 plaintiff 2:17 6:20 6:23 59:17	Plaintiffs 1:5 2:5 3:2,7 plan 155:19 PLAZA 3:9 please 6:18,25 7:1 7:14 46:11 50:2 80:16 94:3 95:1 108:8 113:21 115:1 117:3 126:6 139:10 153:11 160:17 176:7 177:5,13 178:6,11 pleasure 194:9 plenty 20:22 point 28:4 32:18 42:24 43:3,6,11 43:24 44:17 50:14 56:10 67:20 74:15 75:4 79:7 80:12 89:20 97:6 98:1 124:20 134:7 159:24 168:15 172:23 191:9,13 pointing 94:8 policies 118:25 119:23 portion 21:11 41:20,24 45:2 168:3 position 180:22 possibility 37:17 post 180:7 postdeadline 97:10 posted 90:23 117:7 Pottery 145:22 147:3,6 151:17,20 152:2 power 31:19 68:6 practice 14:9,11,23 21:9 22:1 23:11 23:16 24:15,18 56:20 76:23 83:5 83:12 127:25 128:1 133:16,20 136:8 166:12 precisely 50:1 preparation 56:23
--	---	---	--	--

prepare 10:10 19:7 24:24 25:4 31:16 32:23 38:16 56:22 60:4 prepared 20:2 32:23 57:25 present 3:20 28:5 president 59:11 presume 99:12 pretty 18:24 90:11 previous 118:23 143:23 previously 89:19 164:16 principal 14:20 17:9 115:5 prior 10:1 17:12 18:6 122:2 136:10 pristine 44:4 PRO 3:18 probably 65:9 problem 164:6 problematic 83:11 Proc 196:7,11,14 procedure 24:16 68:12,15 procedures 119:1 119:23 proceeding 16:7,7 194:17 proceedings 194:21 196:5,10,15 process 19:13 67:2 90:10 144:25 145:1 processed 179:16 produce 90:10 170:7,13 produced 55:24 90:10 producer 18:14 130:14 product 31:13 production 17:7,11 17:18 18:9 24:11 52:11 104:18 109:19 129:7	178:17,19 179:4 Productions 136:22 146:3,10 professional 12:9 68:23 108:17 109:2,5,24 Professional's 109:7 prompted 38:3 41:10 42:2 63:25 152:23 158:14 proper 175:15 180:4 properly 166:4 188:17 Property 177:18 proved 122:11 provide 21:21 57:25 91:6 101:13 106:18 113:2,18 114:24 163:21 179:1 184:17 provided 9:15 83:22 91:4 98:15 100:12 108:4 131:1 137:18 150:7 165:5 178:24 196:17 provides 14:3 providing 24:6 77:19 95:10 99:14 125:9 143:14 150:16 151:4,10 158:9 159:22 160:12,25 163:18 167:14 168:11 169:6,9,24 170:5 179:4 proximity 163:5 public 12:13 pull 126:6 purchase 53:20 174:23 175:4 purchased 47:8 164:11 purely 52:11,12 149:12	purported 170:18 purportedly 169:24 purpose 18:23 36:2 68:22 80:21 81:10 84:9 87:23 96:1,5 97:7 98:10 99:3 100:7 101:10 105:4 106:14 108:2 110:5,8 111:25 113:14 114:12,20 117:14 132:20 170:24 purposes 132:5 153:19 186:10 pursuant 2:20 8:2 pursued 122:22 put 28:8 44:13 49:23 52:25 80:22 116:3 140:20 141:19 149:14 172:24 174:12 188:21 putting 145:4 154:21,23	R R 196:4,8,11,19 raise 7:1 raised 45:14 rapidly 79:19 172:1 rarely 164:23,24 rate 84:3 Ray 4:21 123:8,9 124:19 135:15 139:10 143:25 167:9 re- 47:5 93:21 147:23 159:17 reach 25:18,24 reached 38:1 read 13:15 101:22 145:12 172:25 182:11 190:10 192:5 195:5 reading 129:10 145:10 real 13:25 144:17 realize 30:9,14 45:19 realized 27:19 30:17,18,24 34:11 37:21 really 22:8 44:2 145:11 190:10 reason 43:9 56:11 57:17,20 65:13 83:5,15 98:5 101:10 103:2 112:21,24 114:9 114:10 122:13 146:23 167:10 179:25 192:16 reasons 121:8 recall 14:25 22:8 23:20 24:1,4 27:13 30:12 32:1 32:11,16 33:20 44:24 46:1 47:7 49:19 52:6 55:23 58:21,24 62:16,19	66:5 67:2,19 68:12,15,18,21 70:20 71:6,10 72:19,20 74:2 75:2,15 76:7 77:23 78:2,3,4,6 89:24 90:2,20 97:18 98:20 99:5 103:22 104:5,8 107:4 127:23 129:20 130:18 131:3 132:12 134:21 135:20 143:11 150:6 152:21 159:17 161:24 164:8 165:18 166:5,9,17 167:3 170:1,3 172:8 173:3 174:18 189:4,6 192:11 receivable 111:11 receive 7:25 21:16 21:20 22:19 39:17 41:16 47:19 78:9 83:25 131:16 149:16 188:3 received 7:25 8:1 10:24 11:4 21:21 39:20,24 40:3,5 41:22 42:5 78:13 90:21 92:19 93:13 106:10 109:23 126:22 128:13 132:18 134:22,23 149:18 171:6 172:8 188:10 190:25 191:4,11 193:21 receives 109:17 127:11 receiving 19:5 22:6 77:4,7,23 99:25 125:16 135:20 143:11 150:5 161:24 163:17 168:16,23 169:2
---	---	--	---	--

174:18 recess 46:6 75:8 118:18 161:9 194:4 recipient 87:8 88:8 107:10,14 109:17 recipient's 109:20 recollection 98:8 99:9 136:15 reconcile 137:13 record 5:9,10,12 6:5 7:14 19:6 46:5,7,17 48:1,10 71:4 75:7,9 118:17,19 135:23 161:8,10 182:2 183:20 186:21 194:3,5,20 196:10 recorded 19:24 50:23 56:1 recording 128:7 records 51:20 83:22 151:21 163:14 169:19,23 refer 34:25 72:9 94:24,24 151:22 152:5 164:12 reference 86:12 118:13 125:23 126:16 128:7,9,24 129:19 138:2 144:10 145:2 154:7 155:10,20 156:13,24 157:3 164:7 173:23 175:1 182:15 192:10 referenced 136:21 163:13 172:11 referred 170:10 176:4 referring 29:8 34:15 35:1,5 36:7 44:20 51:2,14 52:3,17 60:23 61:1 78:23 101:25 102:4,7 103:10,19	104:14 105:8 127:1 137:1 147:23 148:7 152:4 153:1 164:13,15 175:10 185:22 refers 86:3 91:9 115:5,13 131:7 154:8 refinance 19:11 refinancing 177:22 reflected 109:20 116:1 refused 189:23 refusing 139:17 regard 57:16 regarding 44:9 46:19 67:20 71:11 77:7 96:5 172:12 188:4,25 193:21 reimbursed 121:3 127:15 reimbursement 127:12 131:5 172:10 related 8:21 29:3 32:3 58:15 148:12 relates 21:9 relating 30:7 relation 33:11 relationship 19:15 19:18,20 20:13 27:9,16,17 28:8 31:3 38:22 39:9 43:1 44:9 45:13 60:8 64:5 69:15 71:17 84:24 relative 6:7 196:12 relied 134:7 relying 97:12 remaining 17:12 81:15 remember 15:15 50:7 60:18 61:21 104:22 107:6,7 132:19 152:2 166:19 185:23	189:13,14 remind 172:15 repair 54:5 replace 145:12 replenish 144:4 report 57:8 124:11 125:2 127:4 137:6 139:10,15 160:3 188:1,17 reported 124:12 170:24 171:8 172:3 reporter 6:17,24 7:1,19 13:7 62:1,4 69:3 76:1 85:11 88:19 93:18 123:2 135:6 143:5 152:11 160:17,20 160:23 161:16 173:11 181:24 183:16 186:17 196:2,17 reporting 132:6 reports 137:5 170:7,11,13,17,20 represent 6:19 8:9 87:5 93:21 representation 56:24 57:7,10,22 97:14 134:8 representations 57:16 represented 8:5 189:9 representing 189:20 requested 5:17 36:3 97:18 196:16 196:16 required 26:3 56:21 97:24 requirement 188:16 requirements 180:23 reserve 144:6,11 145:6,14	respect 8:20 19:3 34:3 35:22 36:12 36:17 45:7 52:14 57:12 59:14 67:4 68:13,16 73:11 74:17 77:21,24 78:7 84:8 98:7 107:13 112:25 114:22 118:23 119:6 120:6 131:15,22 132:25 133:21 134:24 169:8 171:4 176:17,22 178:18 184:10 190:4,8 respond 46:12 50:2 144:1 responded 166:17 174:7 191:2,3 responding 192:23 response 11:12 137:24 164:12 166:21 191:4 responses 87:18 responsibility 77:10 79:15 136:5 142:20 responsible 161:3 172:20 rest 15:11 193:5 result 9:2 39:8 resurrect 31:17 retained 186:10 retire 120:2 return 24:19 25:3,9 25:20 26:1,2,4,7 26:10,14 31:14,17 31:20 32:8,10,15 32:23 33:9 51:18 51:19,20,21 57:19 57:21,23,25 58:22 60:4 72:6,8,12,18 90:13 96:20,22,25 97:2 103:9 115:14 120:21 134:6 160:5 171:11 172:24 173:7	180:21 181:4,12 181:15 183:12 185:2 188:4,14,20 193:22 returning 115:22 returns 19:7 20:2 24:16 25:14 38:14 38:16,20 57:13 71:24 96:8,15 97:11 180:17 182:13 183:1,6 184:4,20,25 185:4 185:19 186:24 187:8 188:25 189:5 revenue 168:6,7,8 182:13 183:25 184:4 186:23 review 47:16,18 125:6 153:12 196:15 reviewed 173:3 reviewing 159:17 revive 31:20 53:9 revoked 124:13 revolution 122:1 right 7:1 9:24 19:10 21:11 27:21 28:2 61:5 66:8 75:20 79:23 82:18 86:11 116:20 120:13 121:1,18 122:9 131:3 140:5 140:9,20 141:22 143:2 147:14 152:8 153:3 159:9 164:5 169:20 175:20 184:11 right-hand 94:21 RNT 153:16 road 117:24 177:19 role 19:2,7 59:14 163:10 room 80:22 Round 177:19 routine 71:14 routinely 116:6
--	--	---	---	---

ruined 39:14	says 57:9 62:25	86:14 88:6,10	sender 86:15,15	159:13,22 160:13
rules 57:6	64:21 65:2,16,18	89:1,7,14 91:11	109:14	161:1 162:23
run 49:14,17 55:5	65:20 66:7,22	94:21 95:20 98:25	sending 91:24	163:21 168:4,11
70:18,21,23 71:3	67:22,25 68:22	100:2,5,23 101:3	112:4 134:19	169:5,10,25 170:5
167:22	80:1,7,9,20 89:14	101:7,21 102:7	139:6 152:21	171:22 177:14
runaround 175:21	94:22 101:24	103:8 106:10,12	191:8	179:5 182:3,15
running 37:2 70:16	103:3,8 109:11,18	107:2,14 108:18	sense 29:23 45:12	183:1,6 184:17
79:13,19 98:3	117:20,21,22	109:5 110:15	91:22 120:12	191:22
144:13	125:22 127:12	111:22 112:1	122:17 157:21	serving 83:12
Ruthless 28:3	128:17,18,21	113:5,9 114:2	166:15	89:21 102:12
	129:11 134:19	115:11,16 117:8	sent 67:4 89:18	107:9 108:21
S	137:10 147:15,15	118:7 121:5,24	102:15 109:11	110:17,22 119:11
S 3:8 4:7 5:2	147:17 148:16	128:8,10,22	124:19 137:24	set 35:24 53:24
187:25	153:21 154:12	129:17 133:14	159:18 173:2	60:10 68:4 82:4,6
safeguard 146:19	155:11 156:15	135:12,18 136:1	191:6	82:21 83:6,7
Sahid 129:13	157:12 158:23	137:9 138:4	sentence 144:10	89:13 144:12
salaries 40:7	160:2,5 176:23	143:18 144:8	separate 24:4,7,13	167:25 196:6
salary 39:20 149:3	177:4,18 178:11	145:23 148:14	72:6 86:22 96:22	setting 83:7 85:1
149:5,5,16,19,24	179:6	153:2,23 155:18	97:2 129:7 144:17	167:24
150:5,9,11,14	scene 31:23	157:1 158:3,19	144:18 187:13	settled 45:4
168:16,23 169:2	SCHER 1:8 2:8	159:15 161:22	separately 72:12	seven 9:12,22 15:3
171:6	SCHOTZ 3:3,8	162:25 169:18	September 5:7	15:3,8 49:25
sale 129:24	Schwabsky 60:20	173:17,21 174:20	65:20,22 66:4	75:21
sales 162:24 163:18	scientific 68:23	174:24 176:11	118:5 161:19	Seventeen 126:12
163:21 165:5	scope 190:11	177:15 178:13	165:10	Shahab 4:21 123:6
167:5,15	season 24:23 42:5	182:17,23 183:22	serve 50:1 119:12	123:8,9,16,18
San 3:15 54:4	Sec 8:19 90:9 191:6	184:8 187:1,13	119:18	124:1,3,20 125:2
Sandra 1:21 2:19	196:4	seeing 54:11 58:3	served 7:23	125:10 127:4,19
6:17 196:1,24	second 15:18 48:23	76:7 132:13 170:1	serves 168:1	135:16,22 136:3
Santa 2:17 6:12	49:2 51:22 61:21	170:3	service 21:8 68:23	136:15 137:1
Sarkisian 185:24	80:4,5 88:4 99:24	seek 181:9	110:4 137:23	139:10 143:9,15
sat 10:3 179:21,24	100:5,25 126:9	seen 44:5 62:15	178:24 179:1	152:16 167:9,10
satisfied 175:21	134:18 135:14	64:3 75:16 85:20	182:13 183:25	Shahab's 136:19
saw 27:24 33:1	143:25 153:20	89:3 124:16	184:4 186:23	shared 36:10
34:23 43:14,18	155:9 170:22	169:15 170:15	services 4:17,19 5:9	sheet 22:21
58:6 82:3,19 83:4	174:21 176:23	segregate 129:5	6:7 24:6 40:6	short 39:20 44:24
107:12 132:12	see 11:6,15 13:13	sell 53:10 54:5	50:12,15,18 71:22	46:3 60:3,9,14
148:23 153:1	14:5 42:11 43:17	164:9 165:8	85:15 88:23 95:10	61:15 103:16
158:5 169:16,23	52:21 55:21 60:13	selling 166:14	95:19,22 98:15	116:3,20,22
171:16	61:25 62:10,16,18	send 64:7,8 66:17	99:15 100:1,12,22	117:15 120:1
saying 21:16 62:18	62:18 64:23 65:20	66:19,19,20 68:6	101:13 106:10,18	158:12 161:6
63:12 89:19 97:19	65:24 66:22 67:11	70:25 71:4 74:6,7	108:6 111:21	171:17 194:1
111:9 121:24	68:22 71:8 74:23	135:2 136:6,13,15	113:2,19 114:1,5	Shorthand 196:1
126:1 132:12	76:20,24 78:21	137:4,10,13 144:6	114:6,12,24	show 7:16 13:4
133:14 139:8,10	79:9 80:3 81:7	145:14 146:23,24	130:16,25 137:17	61:4,19,23 68:25
141:17 151:7	82:8 83:17,24	152:23 164:3	150:16 151:4,9	75:23 85:8 87:5
165:25 166:11	85:18,25 86:6,8	175:24	156:25 158:9	88:16 89:10 91:16

93:15 99:24	sister 16:19,20,21	source 53:1 56:2,2	195:1	183:25
109:16,16 122:24	sit 10:2 59:5 87:22	81:21 86:13 128:5	statement 4:17,18	strong 43:18
135:4 143:2 152:8	98:7 149:11	149:7 173:1	24:25 26:5 32:8	structure 69:23
161:13 173:8	179:24	sources 51:15	47:19 51:20 56:22	structured 22:18
181:21	sitting 90:20	58:23 59:2 104:12	56:23 57:8 72:15	stupid 42:7
showed 191:5	134:13 140:2	south 44:11 45:8,15	76:5,10,17 84:10	Stupidity 41:12
showing 62:7 135:9	146:22 151:25	Sovrin 32:7,22	85:14,20 88:22	sub 156:15
147:6	situation 39:15	33:11 38:16 60:21	90:8,12,13,13,18	subject 16:6 162:20
shown 170:21	53:17 140:23	71:1	91:15 92:18,23	subpoena 7:23 8:1
shows 92:19 98:3	situations 122:18	span 51:8	93:2 94:14,15	8:3 10:24 11:4
117:5 137:7,14	six 15:3,8 49:25	SPC 1:4 2:4 3:2,7	109:21,22 111:12	190:25 191:4,6,17
145:20 182:13	51:9 83:20 181:11	spe- 142:6	115:4 132:4 173:6	subpoenaed 11:10
184:4 186:23	size 25:6	speak 10:13,15,25	181:13 186:13	90:9,14 191:17
188:20	small 21:11 40:24	11:7 28:5 116:21	statements 4:20	subsidiaries 156:4
shrewd 28:2 122:21	so-called 167:4	specialist 6:6	25:1,4 38:20	subsidiary 69:14
sic 26:5	Societe 88:9,9,13	specific 71:13 99:9	47:11,17,22 55:24	70:2 72:5,14 97:5
side 49:21 65:21	sold 164:10 165:15	100:17 104:21	93:22 94:13 126:3	155:17,23,25
79:17	165:22 166:2	154:16 163:10	171:13	156:3,11,22
sign 57:24 63:13,15	solemnly 7:2	189:4,6	states 1:1 2:1 18:19	187:24
63:16,18,22 64:1	Solomon 152:16	specifically 70:23	101:18 115:4	substantial 144:13
64:7,17 66:20	154:19,19	76:11,18 90:2	135:22 145:18	171:16
74:4,7,14	somebody 44:6	99:17 125:20	155:17 157:11	substantiate
signatories 95:4	97:12 163:4 185:7	140:12 176:5	158:18 177:5,13	131:14 133:8
signatory 64:11,13	somebody's 133:12	180:16 186:6	182:10,12 183:11	134:1 152:5
67:16 76:15 77:12	someone's 120:21	speculation 28:23	183:24 185:2	substantiation
81:25 84:15 95:3	son 142:17	38:5 142:8 183:9	186:22	131:21
158:5 184:14	soon 105:2 137:12	spend 58:25 143:19	stating 187:6	successful 53:14
185:11	sorry 10:14 11:2	146:6	status 17:14	sudden 49:22
signature 33:1	16:19 23:15,24	spending 46:14	step 95:2	122:19
62:17,19,25 63:1	25:23 26:6 55:16	spent 151:20 173:4	steps 56:17 57:15	sued 10:6
63:2,9,12 64:9,9	62:2 71:20 82:15	spoke 10:16,16,23	83:9 128:11 165:9	sufficient 90:16
73:17 74:8 78:12	95:18 115:7	11:3,5 189:2,7	Steve 161:20	180:23
80:6,23 195:13	121:23 123:24	190:16 191:13	162:24 163:4	suggest 127:17
signed 32:18,21,25	126:14 137:21	spot 73:16,22	166:1 174:8	Suite 3:4,15 66:10
57:23 60:6 63:10	142:1 147:20	ss 195:1	stole 124:8	193:12
73:25	160:19 174:6	stand 140:21	stopping 75:4	summaries 153:21
significant 27:10	181:18 182:7	stands 12:17	stories 30:16	summarize 9:22
signing 33:2 62:19	sort 17:15 19:15	145:16	story 54:2	sums 171:16
74:2 150:25	20:13 23:9 24:8	start 25:4 30:16	straightforward	supervision 125:4
simply 65:13 81:13	34:11 84:2 105:16	55:21 115:8 184:2	30:24 31:2 44:5	suppose 77:17
single 90:22 141:13	119:24 120:24	184:2	strange 64:2	150:19 157:14
166:25 170:3	152:5 169:10	started 44:11,18	street 3:4,9 66:8	supposed 67:1
sir 7:12 12:9 13:10	175:20 190:9	45:17 50:20,25	strictly 20:8	90:15 136:6
13:22 14:16 46:10	sorts 89:21 120:6	122:19 129:5,20	strike 10:2 35:20	150:13 183:11
62:7 73:1 75:12	125:15 131:16	149:23 160:20	49:4 55:10 61:11	185:2
85:14 93:21 131:2	179:22	190:25	102:18 109:5	sure 9:25 17:21
152:20	sought 54:6	state 6:19 7:14	124:14 169:18	24:17 32:15 34:5

37:7 42:14 46:13 46:15,16,18 50:5 51:9 57:25 68:3 86:6 89:17 94:5 94:10,10,20 101:23 110:5,21 114:20 119:8 130:17 144:15,17 147:13 148:18 164:4 174:20 177:20 179:2 193:10 surprised 43:17 112:1,6 surprises 112:12 surprising 87:3 suspended 16:3 suspense 52:25 175:23 suspicion 98:1 122:11 suspicious 97:25 Swartz 4:17,18 5:9 50:12,18,22,23 52:5 55:22 56:5 56:14 58:4,5,7,20 59:6,8,11,14,16 75:14,16,18,18 80:2,4,10,10 85:15 86:18 87:25 88:22 89:11 91:15 92:19 93:13 95:19 95:22 98:15,18,19 98:23 99:15 100:1 100:3,13,21 101:1 101:6,14 106:10 106:19 107:1,10 107:18,23 108:2,4 111:20 112:2,4 113:2,8,11,19 114:6 126:23 127:1 131:5,23 132:9,11,13 133:1 141:5,11 156:25 157:3 159:13 160:15 161:1 162:23 163:21	166:2 176:18 182:3,15,25 183:6 190:9 191:22 Swartz's 157:9 swear 6:25 7:2 sworn 7:7 196:7 system 167:1 <hr/> T T 4:7 5:2 take 46:3 50:3 56:17 57:15 74:21 84:5 90:17 95:13 118:15 121:9 126:7 127:14 128:11,17 132:22 146:7,23 161:6 165:9 191:18 194:1 taken 1:17 2:16 46:6 75:8 118:18 161:9 194:4 196:5 talk 11:9 18:9 24:15 87:13 190:19 talking 33:17 43:22 43:23 79:21 102:1 102:2,3 103:20 130:2 190:12 tandem 78:16 tangible 130:8,10 task 83:8 tax 19:7,12 20:2 24:16,19,23 25:3 25:4,8,14,20 26:1 26:2,4,7,9,10,14 31:14,16,20 32:7 32:9,15,23 33:9 38:14,16,20 51:18 51:19,20,21 57:13 57:19,21,22,25 58:22 60:4 71:24 72:6,8,12 90:13 96:8,14 97:11 120:21 132:5 134:5 141:21 144:6,11,12 145:6	145:14 146:20 153:19 160:3 171:11 172:24 173:7 180:17,21 180:23 181:4,12 183:1,6,11 184:20 184:25 185:2,4,19 187:8 188:4,14,19 188:25 189:5 193:22 taxes 40:14 53:15 133:11 144:15,16 144:18,20,21,22 144:23,24,25 151:2 168:3 193:22 taxpayer 26:4 57:23 TBD 157:12 technical 68:23 TECHNOLOGI... 1:9 2:9 telephone 91:3 tell 7:3 9:19 24:21 56:14 70:5 80:11 90:7 115:20 130:21 143:19 149:12 151:23 153:18 173:1 175:24 180:5 193:3 telling 57:18 79:9 84:17 98:3 111:16 133:9 153:11 tells 66:25 temporarily 175:22 ten 22:9 33:15 53:12 term 129:19 174:2 terms 19:4,13 21:12 30:25 37:20 65:11 79:16 155:22 180:23 testified 7:8 38:15 46:19 58:2,2 60:22 69:6 96:17 109:4 140:8 171:5	179:21 testify 192:16 testimony 9:15 25:10 30:12 39:23 40:2 45:16 47:1 48:17 49:12 55:1 63:10 72:11 75:17 84:20 87:22 90:16 101:9 106:17 110:7 113:1,17 119:22 132:9 139:5,16,18,21 141:10 142:4 151:3 158:8 165:4 168:10 170:10 184:16 193:20 196:10 TEXAS 3:4 text 91:3 120:24 Thank 14:16 46:17 160:23 194:9,14 194:15 thanked 121:2 Thanks 94:8 135:25 142:25 162:24 194:8 Theaters 91:10,14 92:10,21 thing 105:17 119:21 120:24 131:6 140:21 176:20 190:9 192:2 things 36:13 44:11 44:17 45:8,15 121:7 134:11 142:15 154:23 think 23:10 26:24 27:2 28:10 30:10 31:24 32:7 35:23 36:1 38:10,23 42:12,14 44:13,13 45:24 49:7 53:12 53:21 54:9,24 58:18 60:8,13 61:16 64:12 71:8 74:5 80:25 83:19	83:20 87:20 89:13 89:17,17 90:11 96:6 102:25 103:2 104:22 112:11 122:7 130:6 131:15 149:22 150:4,4 154:5 174:16 177:20,21 181:7 190:18,20 thinking 34:7 third 80:19 93:9 101:5 114:18 170:23 thought 31:2 34:7 38:15 102:4 112:8 112:9 thousand 45:5 58:8 61:20 66:23 three 8:14,15 11:21 19:3 30:21 42:6 42:10 71:2 81:15 81:17 92:19 100:17 113:23 114:22 147:4 153:14 156:2,18 156:21 189:19 194:17 Tim 189:15 time 6:11 8:17 10:3 10:5 15:25 17:12 18:4 22:21 23:19 23:25 29:11,19 31:1 32:18 37:1 39:21,22 41:11 42:24 43:6,11 44:17,24 45:14 46:4,8 49:21 51:10,16 53:3,18 54:10,16,18 55:13 55:13,18 56:1,4 56:10 57:4 58:20 60:3,9,14 61:16 61:17 64:12 66:6 67:1 69:14,23,24 70:6 75:6,10 77:4 77:8 78:5 79:7,20 80:12 81:12 82:23
--	--	--	--	--

82:24 83:3 85:16	56:16,18 59:1,4	137:7 139:11	truth 7:3,4,5 57:19	65:3,17 66:24
87:5,12 88:24	105:18 132:19	140:17 148:12,20	193:3,4	67:12,14 72:21
89:13,20 90:4	165:20	176:3 178:6	truthful 57:18	73:10,13,15,18
91:1,5 93:12 95:9	tomorrow 11:16	179:23 190:4	87:18	76:6 77:20 78:1
95:24 96:8 97:6	135:24 137:10	transcript 196:16	try 94:8 131:18	78:22 79:25 86:2
98:1 102:21	tomorrow's 139:10	transfer 78:19 79:1	trying 18:18 19:11	88:3,7 94:23
103:14 111:8	top 57:9 62:8 64:21	80:15,17 81:14	28:2 37:9 51:12	95:14,17 100:20
112:18,22 118:16	94:21 98:21 117:5	82:1 87:2 93:10	52:2 97:10 122:15	100:24 101:4,8
118:20 120:1	148:16 156:12	95:19 98:23	127:16 130:21	108:19,23 110:18
124:20,24 125:17	total 28:13	101:18 102:21	134:14 146:7	115:12 118:24
125:21 127:21	touched 37:23	104:16 109:17	150:3 151:9	124:10 126:5,15
134:3,7,9,15	tran- 177:1	119:17 127:1	153:18 164:4	126:18,20,24
136:17 140:16	transact 67:18	176:24 177:1	TT 1:4 2:4 3:2,7	129:16 135:1,17
144:24 149:4,19	transact- 91:22	178:6 179:11	59:18 159:9	135:17,19 138:5
149:20 151:1	transaction 18:22	transferor 87:9	Tuesday 1:18 2:19	145:24 152:22
153:6 158:12	40:19 52:18 59:16	transferred 88:13	6:1 11:6	155:2 157:4 158:2
159:18 160:17	61:17,19 83:4	89:10 92:20	turn 65:15 73:14	158:22,24 160:4,7
161:1,7,11 162:10	85:25 86:17 87:5	112:10 139:12	85:23 98:21 106:7	173:16 174:25
165:9 168:15	88:2 89:5,9 90:3,5	146:17 185:17	159:8	176:10 177:3
171:5,18,20	91:9 94:19,25	transferring 79:5	turned 53:14 152:6	179:14,17 182:4
172:23 180:1	95:15 99:18,19	111:6 138:17	166:22 167:1	192:6 193:14
181:14 186:5	100:2 102:13	180:11	two 8:14,15 11:21	ultimately 81:6
190:12 191:7,9,13	103:1,10 104:3,21	transfers 77:21	15:3,10,13,23	umbrella 188:2
193:25 194:2,6,8	106:23 107:5	83:17 84:2 86:22	16:1 17:25 29:9	unable 96:7
194:11,19 196:6,6	108:14 110:12	86:24 91:22 93:3	41:18 43:22 49:22	unauthorized
timely 134:5	111:18 112:25	100:9 151:5 165:2	51:19 67:9 71:2	49:13
times 8:13,14,14,15	113:6,15 115:3,10	176:18 179:15,20	79:23 80:1 83:3	uncertainty 172:18
27:14 29:6,9	117:5 118:5	180:1,15	86:7,21 87:6 96:7	underneath 65:2
103:25,25 104:1,2	126:17 129:6,15	transparent 43:8	96:13,15 97:10	147:15 154:11
190:23,23,24	130:15 137:14	traveled 9:4	99:22 101:16	understand 20:15
timing 104:25	141:13 162:21	treat 153:19	106:8 121:2 134:6	33:10 50:6 51:12
tiny 31:15	172:18 175:23	trial 180:9 191:21	135:10,15 137:5	52:2 55:12,17
title 12:21,24	176:23 177:10	192:13	138:14 142:23	58:12 59:13,25
today 6:17 8:2,6	180:3,13	tried 52:11 175:7	153:14 175:12	61:10 65:4,7
10:11 24:8 39:15	transactions 48:2	190:3	178:5 193:25	67:15 69:22 92:4
59:6,9 87:22 98:7	50:9 55:25 57:9	true 15:24 26:15,17	two-minute 118:15	105:4 106:14
110:6 116:21	64:15 79:24 81:2	77:22 81:15 84:16	type 18:11 59:6	116:11 121:5
120:4 125:18,19	81:16 82:20 83:24	99:17 109:3 114:9	61:12 70:7,11	125:23 142:4
127:11,23 134:19	84:9 89:22 99:22	131:15 156:23	128:1 137:15,23	151:9 157:15
144:5 145:13,19	100:18 101:17	158:7 171:24	167:17	163:12 168:21
171:23 174:8	106:1,2,3,8	182:18 195:7		185:7 190:10
189:3 190:5	107:13 113:23	196:9,21	U	understanding
192:24	119:1,10,24 120:6	trust 1:9 2:9 138:3	Ugh 121:19	27:8,23 29:1
today's 6:10,11	121:14 122:10,13	138:7,8,9,18	Uh-huh 18:10 22:4	35:11 37:10 40:5
194:16	129:12 131:16,23	139:13 148:17	25:13 29:20 43:2	43:25 48:3,21
told 44:23 51:16	133:15,21,23	TRUSTEE 1:9 2:9	54:17 57:14 61:22	49:3 53:3 55:20
53:10,23 54:1	134:15,25 135:23	trustworthy 43:10	62:9 64:20,24	56:4 59:5 79:4

81:9,11,19 87:7 87:23 88:12 91:13 96:1 97:7 99:2 100:14 106:20 107:17 108:1 111:24 112:3 113:4 114:4,11,25 125:8 126:25 127:6,10 129:22 138:6,16 140:1,5 140:6,16 143:22 147:4 153:10 154:7 163:9,16,25 168:22 169:1 172:21 182:25 183:4 184:19,23 understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	video 6:6 VIDEOGRAPH... 3:21 6:4,24 46:4,7 75:6,9 118:16,19 161:7,10 194:2,5 194:16 videotaped 1:16 2:16 6:13 46:15 volume 83:18 volun- 140:15 voluntarily 29:22 29:23,25 49:5 139:6,8 140:11,14 140:15 volunteer 116:16 VS 1:6 2:6	148:25 we'll 9:24 191:18 we're 46:14,14 194:12 we've 84:9 139:11 190:5 wedding 29:12,16 Wednesday 144:22 week 121:2 125:13 weeks 121:2 Weichert 152:7 Wells 4:12,13,15 64:5 83:8 84:24 went 12:3 45:1,8,15 53:25 102:14 104:23 109:1 148:16,17,17 164:1,10 weren't 77:11 84:17 136:11 157:21,22,24 158:8 160:12,25 185:10 whatsoever 28:19 30:8 35:12 138:23 140:1 White 14:3,9 wholly 155:11,14 155:17,25 156:15 156:22 Wiechert 3:14,14 83:23 Wiechert's 55:25 wife 16:19,19,21 150:2 William 6:21 116:15 Wimbledon 1:4 2:4 3:2,7 6:16 59:17 190:8 wine 122:4,5,6 winter 8:18 9:7 87:14 188:24 189:9 190:13 Winton 161:20 162:1 wire 80:2,7,9,11,12	80:13,16,17,18 82:2,2,5,6,9,10 83:7 86:9,15 89:14,17,18 101:19 102:10,14 105:1 106:25 108:16 109:11,17 109:22 110:13 119:21 138:3 139:12 144:5,6 145:12,14 174:22 176:9,13 177:5,13 177:23 178:2,11 179:7,15 wired 42:23 wires 80:8 82:4,25 119:17 179:18 wiring 80:19 82:1 withdrawal 88:5 witness 3:17 4:2 6:25 38:6 98:22 99:21 100:16 106:22 108:13 110:11 113:22 115:2 117:4 118:4 139:19,22 142:7,9 160:19 182:8 183:10 194:9,15 196:6,17 word 9:23 27:22 28:2 43:21 50:3 97:16,22 words 38:23 work 21:21 22:6 26:13 31:13,24 32:5 33:3 36:13 77:16 125:4,6 136:19 162:13 worked 27:4 53:13 74:6 97:13 162:16 working 6:6 44:6 149:2 150:18 163:4,7 170:21,22 170:23 191:11 worry 44:16 45:22 wouldn't 47:18 97:21,23 116:25	131:12 152:3 write 42:22 writes 137:2,25 144:3 162:21 174:21 176:7 writing 116:1 written 23:11,16,20 24:1,5,10 31:11 32:19,21 41:13 60:6 118:25 119:23 169:10,23 wrong 56:11 57:21 94:4 122:8 140:5 187:9,10 190:8 wrote 174:7
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:7 97:1 121:4 136:14 171:20 192:17 unethical 121:6,8 unexpected 49:15 United 1:1 2:1 18:19 183:11 185:1 unsavory 27:20,21 30:11,14 43:5 unsigned 74:13 unvoluntarily 30:3 UPS 134:19 use 43:21 49:9 55:2 usual 98:2 utilizing 50:6	W	W	w	X
understood 14:2 22:10 27:6 33:3 53:6,18 54:18 55:1 61:13 91:				

186:5 193:25 York 8:18 9:4 12:4 39:6 191:13 young 18:17	69:17,19 89:17 97:5 177:20 179:2 100,000 21:13,17 21:20,21 51:7 52:22 98:4 100:25 105:15 112:17 113:7 114:16 118:1 120:25 121:1 125:13 149:14 177:5 178:6 100K 128:21 10100 2:17 6:12 10K 130:15 145:21 147:5 151:12 10th 120:22 11 14:24 90:12 157:10,11 181:7 11/29 98:23 11/8/2011 160:5 11:25 46:4 11:35 46:8 110 144:4 11th 93:23 94:14 113:24 114:15 12 158:1,21 180:17 181:7 12/9 91:9 12:14 75:6 12:49 75:10 123 4:21 125,000 106:11 12553 1:22 2:20 196:1,25 127 94:22 95:13 12th 115:3,9 120:22 13 4:10 45:25,25 50:20 83:19 153:22 156:24 180:17 135 4:23 13th 2:18 100:19 101:6 113:25 114:18 120:22 128:10 14 45:24,25 73:2	154:11 159:8 143 5:5 15 25:8,9 45:24,25 84:5,6 120:20 150 95:18 125:12 125:22 150,000 22:13 41:23 95:18,23 97:8 100:5 110:13 111:6 125:24 126:1,19,22,25 127:17,17,21 132:25 133:10,12 152 5:6 1578 74:18,25 95:4 15th 137:5,11,11 16 182:12 16,000 145:3 16,500 110:3 16,576-dollar 108:15 161 5:7 16K 144:4,7 145:12 145:15 16th 106:24 17 95:13 126:11,16 173 5:8 18 76:18 98:21 181 5:9 183 5:10 186 5:12 1987 13:1 1990s 16:13,14 19th 118:5 1st 85:16 88:24 93:25 94:16	1:7 2:7 2:49 161:7 20 10:9 17:2 54:2 97:13 120:20 20,000 106:24 115:4,10 116:3 178:12 200 51:7 200,000 52:22 98:4 105:15 111:19 112:17,25 113:25 118:1 2000 26:24 90:11 149:22 201 3:10 2010 27:2,3 90:11 160:5 2011 4:22,23 5:5 15:1,2 22:3 23:19 23:25 29:18 39:17 40:3 43:15 54:10 54:14,16 55:13,18 65:20,22 66:4 69:23 71:8,9 72:19 93:12,23,24 94:1,2,14,15 95:9 95:16 96:14 121:17 123:5 124:15,24 125:17 125:20 128:10 133:1 135:11 137:25 143:8 153:5 160:6 180:17,21 182:20 184:6,21 187:6,7 2012 5:6,7 15:4 22:14 43:15 50:19 54:10,14,16 55:13 55:18 72:23 76:18 83:19 85:16,17 96:14 99:23,24 100:18,19,19 106:9,9,24 108:15 110:12 111:19 112:23 113:6,25 115:9 117:7 118:5 124:24 125:17	152:17 153:3,22 161:19 165:10 181:1 182:21 2013 5:8 15:6 22:16 23:19,25 29:19 39:17 40:3 69:23 72:25 88:24,25 90:21 93:12 124:24 125:17,21 173:15 174:19 175:11 176:6 181:3,8 182:21 2014 29:14 41:9 42:24 53:22 54:8 54:9 93:25,25 94:16,16 181:8 182:22 187:7 2015 124:6 182:22 2016 182:22 184:7 184:21 2017 8:18 9:7,9 14:10 39:6 87:15 90:12 183:24 184:3 186:23 188:24 189:9 190:13 191:2 2018 45:6 182:12 2019 1:18 2:19 6:1 6:10 196:22 2025.320(a)) 196:14 2025.330(a) 196:7 2025.540(a) 196:8 196:11 2093 196:4 20th 5:6 152:17 21 27:12 210 66:10 225,000 41:7 42:6 42:17 22nd 106:9 23rd 4:21 95:16 123:5 124:15 126:10 128:10 133:1 240,000 176:24 24th 93:24 94:15
Z				
Z 103:8 107:23 Zarrinkelk 1:16 2:16 3:17 4:3,9 6:14 7:6,15,16 13:20 14:13 63:1 86:8 101:24 118:22 135:9 147:15,17 152:14 194:11,17 195:5 Zarrinkelk's 122:3 zero 181:12 ZKCO 14:17,18,18 14:19,22 80:2,7,8 80:9,11,13,18 82:2,6 86:15 101:19 102:10,14 106:25 107:15 108:16 109:8,14 110:13 115:6,14 115:22 117:21,25 118:23 120:7 123:11 147:16 162:16				
0				
07601 3:10				
1				
1 40:12 46:20 47:6 49:12 87:2,9,24 88:5,8 171:1 1/30/1987 4:11 1:46 118:16 1:55 118:20 10 14:24 10,000 31:24 32:5 116:3 130:20,22 131:12 152:1 10:29 2:19 6:2,11 100 18:25 22:12 37:7 42:14 51:9				
		2		
		2 51:7 65:15,25 76:17 85:23 89:6 91:8 93:13 94:22 171:2 2- 112:16 2,035,031.61 76:19 2:15-CV-6633-C... 6:15 2:15-CV-6633-C...		

117:7	36 4:13 69:1,2 73:4	193:6,8,9	<u>7</u>
25 3:9 12:22 16:12	100:15	4D 91:9,14 92:10	7 4:5,9 156:12
17:2	361-2822 3:16	92:14,21	171:1
25,000 147:25	364,065,000 102:1	<u>5</u>	700,000 45:3
149:12 179:7,11	37 4:15 75:24,25	5 22:2 140:25 171:1	141:21
2536 67:13	106:7	5- 31:24 32:5 50:7	73 126:8
25K 145:21 147:5	373 153:12	5,000 152:2	75 4:15
25th 108:15 110:12	38 4:17 85:8,9,10	50 33:16,18 110:10	75202 3:4
26 1:18 2:19 6:1,10	39 4:18 88:17,18	124:18 148:16,17	<u>8</u>
26th 106:9	<u>4</u>	50,000 89:10 92:19	8 65:20,22
27136 3:15	4 63:5,5,8 92:14	100:3 101:5	80,000 162:22
27th 183:24 184:3	153:15 171:2	114:18 116:4,21	163:13 166:2
186:23	4/18 79:10	117:6 176:18	800,000 40:14
28(a)) 196:4	4/19 78:19 79:10,24	500 91:18	46:25
28,833.33 177:14	85:25 86:17	500- 104:9	85 4:17
2875 193:12	4/20 88:2,13	500,000 40:13 80:5	88 4:18
28th 113:6	40 4:20 93:16,17	80:16 81:5 86:7	8th 5:5 143:8
29th 4:23 135:11	148:17	86:22 87:6 104:21	<u>9</u>
137:9,25	40- 108:8	105:8,14 118:1	9 42:4
2nd 99:23 113:24	40,000 106:11	50K 125:13	901 3:4
<u>3</u>	129:12 138:17	525-6281 3:10	9106 67:10 76:11
3 64:18 112:16	139:12 146:19	53 113:5	9114 85:16 88:23
3/6 103:3	40K 138:2 145:18	5353 177:19	92675 3:15
3:01 161:11	145:19 146:1	557-9391 3:5	93 4:20
3:42 194:2	41 4:21 122:25	57 113:21	949 3:16
3:50 194:6	123:1	58 115:1	94K 145:18
3:51 194:19,22	41,672 92:20	5K 145:21 147:5	97,551.21 118:6
30 139:13	4120 3:4	151:17	99 131:10
30(e)) 196:19	42 4:23 135:4,5,10	<u>6</u>	99.9 136:17
30(f)(1)) 196:8,11	43 5:5 106:21 143:3	6 5:7,8 90:21 94:1	9K 131:4
300 193:12	143:4	161:19 171:2	9th 41:9 99:24
300-some 45:5	44 5:6 108:12 152:9	173:15 174:19	100:18,25
300,000 98:24	152:10,15	60 124:18	
100:21 176:9	45 5:7 161:14,15	600 50:7	
30th 85:17 137:12	450 80:5	600,000 104:9	
196:22	450,000 78:20 79:5	61 117:3	
31 94:2 99:20	46 5:8 173:9,10,14	62 4:12	
31st 88:25 93:25	46,500 41:25	63,167.36 102:2,8	
94:16 111:19	469 3:5	65 118:3	
182:20,21,21,21	47 5:9 181:22,23	65,000 103:3,4,7	
182:22,22 184:6,7	47364 13:12	69 4:13	
184:21,21 187:7,7	474 159:9	6th 89:9 100:18	
33 4:9 7:17,18	48 5:10 183:14,15	101:17 175:11	
34 4:10 13:5,6	183:19	176:6	
61:24,25 66:9	49 5:12 120:10		
35 4:12 62:1,2,3	186:15,16,20		